

US EPA RECORDS CENTER REGION 5



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5 UNITED STATES
6 ENVIRONMENTAL PROTECTION AGENCY
7 REGION V

8 IN THE MATTER OF:

9 U.S. SCRAP CORPORATION
10 Chicago, Illinois

11 and

12 9TH AVENUE DUMP,
13 Gary, Indiana

14 The deposition of EARL JACK KLEPSEK, taken
15 at the instance of the Environmental Protection Agency
16 herein, pursuant to Subpoena as to time and place,
17 before Richard L. Fissinger, CSR and Notary Public in
18 and for the County of Lake, State of Indiana, at Room
19 307, 507 State Street, Hammond, Indiana, on the 23rd
20 day of March, 1988, commencing at the hour of 1:22
21 o'clock in the afternoon.

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24
25
FISSINGER & KNIGHT, INC.

COURT REPORTERS
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A P P E A R A N C E S :

MR. EDWARD J. KOWALSKI,
Assistant Regional Counsel,
111 West Jackson Boulevard,
5CS-TUB-3,
Chicago, Illinois,

on behalf of the Environmental
Protection Agency, Region V.

ALSO PRESENT:

MS. LORI PROKES

* * * * *

MR. KOWALSKI: For the record, this will
be the deposition of Mr. Earl Klepser taken
pursuant to the subpoena authorization of
Section 122-E of the Super Fund Amendment,
Reauthorization Act.

EARL JACK KLEPSEK,
being first duly sworn to testify the truth
and nothing but the truth, deposeth and saith
as follows:

DIRECT EXAMINATION
By Mr. Kowalski:

Q Mr. Klepser, would you state your full name and
spell your last name for the court reporter?

A Earl Jack Klepser, K-l-e-p-s-e-r.

Q Mr. Klepser, I'm going to be asking you some

1 questions today concerning your knowledge
2 regarding two sites; one at 9th and Cline
3 Avenues in Gary, Indiana, which I will refer to
4 as the 9th Avenue site; the other I'll refer to
5 as the U.S. Scrap site, and that one is located
6 at approximately 123rd Street and Cottage Grove
7 on the south side of Chicago.

8 A Right.

9 Q Okay. The court reporter here is going to be
10 taking down your testimony on his machine, and
11 for him to do that, you're going to have to give
12 all your answers out loud and audible, okay?

13 A Right.

14 Q If at any time you don't understand any of my
15 questions, let me know and I'll repeat them or
16 rephrase them for you, and the other thing I want
17 to remind you is don't do that. Don't shake your
18 head in response to a question --

19 A Right.

20 Q (Continuing) -- because he won't be able to take
21 that down, okay?

22 Mr. Klepser, can you tell me your date
23 of birth?

24 A January 7, '45.

25 Q And your current home address?

1 A 4912 -- no. That's my work.

2 Q Why don't you go ahead and give me your work
3 address since I'll be asking that next?

4 A 4912 South Railroad Avenue.

5 Q I'm sorry, what was the street?

6 A Railroad Avenue.

7 Q Railroad Avenue, okay; and what's the name of
8 your business, sir?

9 A Scrap Haulers.

10 Q Okay, and is that a company or corporation?

11 A Just a company.

12 Q It's not incorporated?

13 A No, no.

14 Q Now, your home address?

15 A 4618 West 189th Street, Country Club Hills.

16 Q Is that a house or an apartment?

17 A House.

18 Q Do you currently have any plans to move from that
19 residence in the near future?

20 A No.

21 Q Okay. How long have you lived there?

22 A Fourteen years -- thirteen or fourteen years.

23 Q Okay.

24 A I just pay the bills. I don't pay attention.

25 Q And what's your phone number there?

1 A 957-0732.

2 Q Anyone else who lives there that we can get a
3 message to you in case you're not home?

4 A Sure, my whole family.

5 Q You are married?

6 A My wife, my kids.

7 Q Please take no offense at this question, Mr.
8 Klepser. It's asked of absolutely every deponent.
9 Have you ever been convicted of a felony?

10 A No. I had to check it out.

11 Q Okay. How long have you worked at Scrap Haulers?

12 A I own it.

13 Q How long have you owned it?

14 A I think I bought -- I think I bought the name in
15 approximately '73. '78, I think, or somewhere in
16 there. I've had it for that many years.

17 The lawyer transferred it over. I
18 didn't pay for the company name. They gave me
19 the name.

20 Q So there was an operating company on that site
21 when you bought it in '78?

22 A There ain't no site. I bought a name.

23 Q I see. There is something located at 4912 South
24 Railroad Avenue?

25 A Scrap Haulers, yeah.

1 Q Okay.

2 A I only started that three years ago. My -- my
3 business.

4 Q Uh huh.

5 A I used to pick up scrap.

6 Q Okay.

7 A Just pick up scrap.

8 Q You have been at the location located at 4912
9 South Railroad Avenue since '78?

10 A No.

11 Q How long have you been there?

12 A A little over three years.

13 Q Okay. Is that address in Hammond?

14 A East Chicago, Indiana.

15 Q East Chicago?

16 A Well, you sent me a letter.

17 Q Okay. You've been at that address for three
18 years. Where was your business prior to that?

19 A I worked in landfills picking up scrap. So the
20 company address would be my house.

21 Q I see, and what kind of business is Scrap Haulers?

22 A We buy and sell scrap. Non-ferrous metals.

23 Q How many employees do you have out there?

24 A I think five. Hard to count. I got my kids and
25 wife and, you know, sister-in-law, so how am I

1 going to --

2 Q Let me make sure I got this straight, Mr. Klepser,
3 For my own information, you've operated out of the
4 South Railroad Avenue site for three years, but
5 in 1978 you bought the name of the company.

6 A Well, yeah, I acquired the name.

7 Q Okay; and until 1978, you operated the company or
8 you operated under that name, but you worked at
9 various locations and you pretty much operated
10 out of your house, is that correct?

11 A Yes. I wanted a name for what I do --

12 Q I see.

13 A (Continuing) -- and scrap hauling is what I do.

14 So I wanted that name.

15 Q Prior to going into business for yourself in 1978,
16 who did you last work for?

17 A Oh, I worked for people since then.

18 Q Okay.

19 A You know, prior to that, I worked for U.S. Drum.
20 U.S. Scrap is what it was. Whatever they called
21 it, you know.

22 Q What period of time did you work for U.S. Scrap
23 or U.S. Drum?

24 A I worked from -- I believe it was '71 to approxi-
25 mately '74 'cause I broke my back and I was out of

1 work --

2 Q Okay.

3 A (Continuing) -- after that.

4 Q Was that your reason for leaving in '74?

5 A Right. It's a pretty good reason.

6 Q Okay. Can you tell me the circumstances under
7 which you went to work for U.S. Scrap in '71?
8 How did you get that job?

9 A I was working for another company, and they asked
10 me to go to work for them. More money.

11 Q Which company were you working for?

12 A At that time, I was working for Sonny Churillo.

13 Q What is Mr. Churillo's first name?

14 A Thomas.

15 Q What was the name of his company that you were
16 working for?

17 A The Dump.

18 Q Okay.

19 A Sonny's Dump. I mean that's what -- you know,
20 that's what you called it. That's what it was.

21 Q Okay. Where was that dump located?

22 A There was no address out there at the time. It's --
23 right now, it's in the middle of Waste Management;
24 but -- you know where the lock and dale dam is?

25 Q No. Can you give me --

1 A 130th, right off the expressway. So 138th -- it's
2 right in between there.

3 We had a landfill right alongside of
4 lock and dale dam, the frontage road, the road
5 there.

6 Q And that dump was operated by Sonny Churillo?

7 A (Witness nodding head.)

8 Q How long did you work for him?

9 A From '67 to approximately '71.

10 Q And who hired you for U.S. Scrap?

11 A At the time?

12 Q Yes. You said you received a better offer,
13 better money.

14 A Well, they knew -- you know, I knew people. I
15 guess you would have to say the company hired me.
16 I mean, you know --

17 Q Well, did you deal with any one individual? Did
18 you fill out an employment application?

19 A No, no, I didn't fill nothing out. It's a hand-
20 shake, you know.

21 Q Okay.

22 A All my jobs were that way.

23 Q Did Sonny Churillo have any business association
24 or relationship with U.S. Scrap?

25 A I don't really know, you know. They were friends

1 and -- you know.

2 Q When you say "they," do you mean Sonny and Mr.
3 Martell?

4 A Right, right, Steve and Sonny, yeah.

5 Q Steve Martell was the owner/operator of U.S.
6 Scrap, right?

7 A As far as I know, yes.

8 Q And was he pretty much the one who hired you for
9 U.S. Scrap?

10 A No, Steve didn't hire me. Bob hired me. That
11 was his yardman.

12 Q What was Bob's last name?

13 A Bob Bates.

14 Q When you went to work for U.S. Scrap in 1971, was
15 that at the 123rd and Cottage Grove --

16 A Right.

17 Q (Continuing) -- facility?

18 A Right.

19 Q Okay. What kind of work did you do for Sonny
20 Churillo at the lock and dale dam area?

21 A Well, it was a dump site. Garbage dump.

22 Q Okay. Did you operate heavy --

23 A Operate heavy equipment, right.

24 Q So in terms of your job for Sonny Churillo, as
25 the waste would be delivered at the site, you

1 would level it out with heavy equipment. Was
2 that pretty much your function there?

3 A Yes. It's -- yeah, mostly wrecking equipment,
4 you know, wrecking debris, stuff like that.

5 Q Okay. When you went to work at the U.S. Scrap
6 site in 1971, what was your job there?

7 A Same thing, heavy equipment.

8 Q During the time that you were employed at the
9 U.S. Scrap site, were you an employee of U.S.
10 Scrap Corporation?

11 A I honestly don't remember how the checks were.

12 Q Okay. You were paid by check, I presume?

13 A Right, right.

14 Q How often were you paid?

15 A Every week.

16 Q Do you have any of those check stubs anywhere?

17 A I don't know. I should have, but I don't know,
18 you know.

19 Q Do you recall who signed your check?

20 A No, no. I never got time enough to hold it.
21 Cash it, turn it into money. Spend it.

22 Q Okay. You also worked at the 9th Avenue site,
23 right?

24 A Right.

25 Q Okay. When did you first work out there?

1 A I would think it would have to be in '73. I
2 don't know for sure, but --

3 Q What caused you to go from the U.S. Scrap site to
4 the 9th Avenue site?

5 A I go where the heavy equipment goes.

6 Q So the heavy equipment was transferred out to 9th
7 Avenue in 1973?

8 A Sure. Otherwise, I wouldn't go out there.

9 Q Do you know when the 9th Avenue site was first
10 used?

11 A Time and dates, no, no.

12 Q Do you know in terms of how long before you went
13 out to the site with your heavy equipment?

14 A I would have to say it would have to be within a
15 few weeks to few months because without equipment,
16 you can't do nothing.

17 Q Could you just generally -- I know I'm flip-
18 flopping back and forth here, Mr. Klepser, on you.
19 I'll settle down, I promise.

20 Could you generally describe the
21 operations at the U.S. Scrap site for us when you
22 first started there in 1971?

23 A When I started working there, I started leveling
24 out the pile, leveling out debris, making roads.

25 We had a drum operation. Emptying drums.

1 I would push up debris and, basically, you were
2 forever making roads.

3 Q What was the length of your workday when you
4 started there in 1971? Was it a nine to five job?

5 A No. We would start work, like, seven in the
6 morning and quit at four in the afternoon or so.

7 Q The activities you described, leveling out the
8 debris, making roads; also emptying out drums,
9 does that describe your job duties for the two
10 years you were at the U.S. Scrap site?

11 A Well, I never left the site. I mean, off and on,
12 you would go places, you know, but you would never
13 leave the site.

14 Q Okay.

15 A I was there for a long time.

16 My job was, basically, to run heavy
17 equipment and that's what I did. I mean I would
18 make roads or make the land bigger. You know,
19 it's just what you do. You take a swamp and you
20 level it off and you make it hard ground.

21 Q Okay. How many employees worked out at the U.S.
22 Scrap site when you were there in 1971?

23 A It's hard to say. I would say -- I would say
24 fourteen or fifteen. You know, it grows as you
25 grow, so --

1 Q Uh huh.

2 A (Continuing) -- I never paid that much attention.
3 I mean, you know, you had different people doing
4 different things.

5 Q Did all of the employees work the same hours as
6 you, generally, seven to four?

7 A No, no.

8 Q Were there set shifts for the workers?

9 A Yeah. We was running around the clock, so shifts
10 would be -- you know, I never had any restrictions
11 on my hours.

12 Q Okay. You said when you started in 1971 there
13 were fourteen or fifteen employees. How many
14 heavy equipment operators were there?

15 A I was the only operator. There was other people
16 running equipment, but I was the only operator.
17 You teach somebody as you go along.

18 Q Did you belong to any Local?

19 A 731. Used to belong to 150, but 731 -- 150 didn't
20 want landfills at that time.

21 Q Okay. So during the period of time that you
22 worked out at U.S. Scrap and 9th Avenue, you
23 belonged to 731?

24 A (Witness nodding head.)

25 Q Where is their hall located?

1 A Gee, I don't know. Down in the city, but it's
2 just a trucking union. So it's, you know -- it's--

3 Q Okay. Is that AFL-CIO?

4 A Yes, as far as I know, it is. I think all the
5 trucking unions go under that.

6 Q And other than heavy equipment operators, what
7 other job positions were out at the site in '71?

8 A Well, truck drivers, laborers. You know, job
9 site -- I mean that's about it. Workers, you
10 know.

11 Q How many drivers were there?

12 A I'm trying to remember. I think there was five
13 or six.

14 Q Were they Union drivers?

15 A Sure.

16 Q Okay, and they were also out of 731?

17 A Sure.

18 Q And again, speaking in the time frame of 1971,
19 how many laborers would have been out there?

20 A Had to be eight or nine laborers, ten laborers.
21 They come and go, you know. We just -- it's a
22 constant turnover.

23 Q Sure. Were they pretty much non-union; the
24 laborers --

25 A Right.

1 Q (Continuing) -- as far as you know?

2 A Pretty much Mexican.

3 Q And in terms of other employees, were there any
4 other people on the site when you started there?

5 A Well, when we started there, I started there --
6 you know, it was already a small company.

7 Q Sure.

8 A And we -- you know, occasionally we'd get a girl
9 working in the office or something, but that
10 would be it.

11 Q Is that Linda, do you recall?

12 A Linda worked there, yes.

13 Q Do you recall Linda's last name?

14 A No, I don't.

15 Q Was it Linda Spletzer? Does that ring a bell
16 with you?

17 A No.

18 Q That doesn't ring a bell. If you heard the name,
19 would you recall it?

20 A I never knew the name, to be honest with you.

21 Q Okay.

22 A I never -- no. Linda was all I ever knew.

23 Q Linda was a young blonde, is that right?

24 A Linda was a girl that tried to be a boy, so --
25 whatever.

1 Q I've heard that before. I've heard that before.

2 A But that --

3 Q Was her name Linn or Linda?

4 A Linn is what we called her. Never Linda.

5 Q Did she work out -- she worked in the trailer on
6 the site, is that correct?

7 A Yep, yep.

8 Q What was Linda's position out there?

9 A I never could figure that one out.

10 Q Did she have anything to do with record keeping?

11 A She would do some -- some -- make out some
12 receipts or something like that. But what I
13 think, she got the job because the guy liked her
14 partner in the truck. She used to ride on the
15 catering truck. I think that's how the job came
16 out.

17 Q When you say the guy liked her partner, which guy?

18 A The -- Bob.

19 Q Bob Bates?

20 A It had to be because there was no need for a girl
21 being down there.

22 Q Was there a dispatcher for the truck drivers at
23 the site?

24 A Basically, Bob and them, yeah.

25 Q When you say "Bob and them," anyone else you can

1 remember?

2 A Well, if Bob went to lunch, Linda or somebody
3 else did it. Dispatcher -- anybody could hand
4 the driver the ticket and he goes to the counter.
5 That's it. There was -- we had radios in the
6 trucks, but that was no big thing 'cause once you
7 got so far out, they didn't work.

8 Q Was Bob at the site pretty much on a daily basis?

9 A Yeah.

10 Q Did Bob operate the site the entire time you
11 worked out there?

12 A He was -- yeah, yeah, yep.

13 Q Did Linn work out there the entire time you worked
14 out there?

15 A No. She started after I did; and when I left, I
16 don't know who did or who didn't stay.

17 Q As of the time you left --

18 A She was there, yeah.

19 Q (Continuing) -- Linn was still there?

20 Was Bob still there?

21 A Yeah.

22 Q Have you seen Bob since you left Scrap?

23 A I passed him on the road once and that was it.

24 Q Do you know who he's working for now?

25 A No idea, no idea.

1 Q When you say you passed him on the road, was he
2 in a vehicle?

3 A Yeah.

4 Q Okay.

5 A I swore it was him, but I don't know.

6 Q Was it a company vehicle?

7 A No, no, just a car.

8 Q Do you know where Bob lived?

9 A No. I have no idea. In Chicago, I know that;
10 but where, I don't know. He was a weirdo.

11 Q What do you mean by that?

12 A Couldn't take off his socks in front of you.

13 That's weird to me.

14 Q How about Linn; do you know where she lives?

15 A She was around 18th Street.

16 Q 18th Street in Chicago?

17 A Yeah, yeah, right off the Dan Ryan, but I don't
18 know if she's still around there or not. I've
19 lost touch with everybody since then.

20 Q Have you?

21 Okay. Other than yourself as the heavy
22 equipment operator, the drivers, the laborers,
23 Linn and Bob, can you recall anyone else who
24 worked out at the site?

25 A Worked on the site?

1 Q Yeah.

2 A We had drivers --

3 Q Okay.

4 A (Continuing) -- you know.

5 Q Well, let's get to those now. Do you know --
6 recall the names of any of the drivers?

7 A Some of them I do. Bobby Thompson, Ronnie
8 McFarland. There was another one. I don't
9 remember his last name. Ray -- but I don't
10 remember his last name; and I don't remember the
11 colored guy's name.

12 Q Did Bobby Thompson, Ron and Ray work out there
13 the entire time you worked out there?

14 A No, no. They came after me. Yeah, they came out
15 after me.

16 Q Do you recall any of the drivers who were working
17 there when you started?

18 A Only driver I ever -- at one time was Leroy.

19 Q Leroy. Is that Leroy Brown?

20 A Yeah.

21 Q Was Leroy just the driver or did he have other
22 duties out there?

23 A No. Leroy was just a driver. He was -- you know.

24 Q He was out there when you started, right? Yes?

25 A Oh, yeah, yeah.

1 Q Was he still there when you left?

2 A Yeah.

3 Q Do you know where Leroy, Bob, Ron or Ray are today?

4 A Well, Leroy still works for Steve. Ronnie works
5 for another company. Bobby works for Mid-America.
6 Used to be Mid-America. I don't know. EPE or
7 something or EPS, whatever the new company is.

8 Q Where are they located?

9 A 138th and Halsted.

10 Q And where did you say Ron works?

11 A Ron works at ECCS.

12 Q And where are they located?

13 A Right now, they're in Griffith.

14 Q Leroy Brown still works for Steve?

15 A Right.

16 Q Do you know which company? Is that for Paxton
17 Landfill?

18 A Right.

19 Q Do you know what happened to Ray?

20 A I'm not sure if that's his name or not.

21 Q Okay.

22 A There were some colored guys in there and I just
23 don't remember their names, and this here was a
24 white kid, and I don't remember for sure what his
25 name was.

1 Q Okay.

2 A In fact, I just can't remember the name of the
3 company. His uncle owned a trucking company in
4 the area, and I couldn't figure out why he was
5 working for us when his uncle owned a trucking
6 company.

7 Q Ray was a young white kid, you say?

8 A Yeah, truck driver.

9 Q When you say "young," in his twenties, early
10 teens?

11 A Yeah, early twenties.

12 Q Do you recall the names of any of the other
13 drivers that worked out there during your period
14 of employment?

15 A I don't remember the names. There was a couple
16 colored guys, and I just --

17 Q Okay. Did the same drivers who worked at the
18 Scrap site also work at 9th Avenue?

19 A Well, I would think so, yeah, because a driver is
20 a driver, you know.

21 Q The driver would deliver the scrap and sometimes
22 he'd also deliver to 9th Avenue, is that correct?

23 A Well, I don't see where you get the terminology
24 of "scrap."

25 Q I'm sorry. When I say "Scrap," I'm talking about

1 the U.S. Scrap Corporation site, 123rd and Cottage
2 Grove.

3 A Right. It's -- yeah, it would be the same drivers--

4 Q Okay.

5 A (Continuing) -- naturally.

6 Q So there weren't two separate sets of drivers for
7 the two different sites, right?

8 A No.

9 Q When you say "no," that statement is correct?

10 A Same drivers. That's all I ever knew about --

11 Q Okay.

12 A You would pick a nice driver. One that wouldn't
13 get stuck all the time and you would use him more
14 than you would use the other guy, but as you go
15 along, you hire other people; but they're not for
16 separate things.

17 Q Okay. Do you recall the names of any of the
18 laborers who worked out at the U.S. Scrap site?

19 A Jesus, Carlos.

20 Q Do you recall any last names?

21 A I never knew those last names, really.

22 Q There was a pretty high turnover in the laborers?

23 A Yeah, because the Spanish laborers worked for
24 three months, go back to Mexico. Spanish laborers
25 worked for three months, go back to Mexico or

1 whatever that may be.

2 Q Were there ever any laborers that worked -- worked
3 for a year; stuck around?

4 A Yeah, Carlos, Jesus.

5 Q Do you know where they are today?

6 A I think Jesus is still with Steve. Carlos, I
7 believe, is in Mexico. Last I heard, he was
8 supposed to be a mechanic. A little one named
9 Oscar. I can't forget him.

10 Q Do you know where Oscar is today?

11 A No. I wish I did. He was a good worker.

12 Q Was he also an immigrant?

13 A I wouldn't say they're immigrants. They're just
14 Mexicans. He was also a Mexican.

15 Q All right.

16 A Whenever a squad car came, they ran. I don't
17 know if they were immigrants.

18 Q Okay. Did Steve -- Steve Martell ever have any
19 of his relatives working out at U.S. Scrap or the
20 9th Avenue sites?

21 A Not that I know of. I mean, you know, what -- as
22 far as work, like you say "work" --

23 Q Okay.

24 A (Continuing) -- not that I know of, no.

25 Q Okay. Did Steve himself ever work out at the site?

1 A Sure, he worked.

2 Q Was he there on a regular basis?

3 A No.

4 Q How often would he come to the site?

5 A He would come -- sometimes you wouldn't see him
6 for a week and he would come down. I mean he's
7 around someplace.

8 Q Uh huh.

9 A But he would come down and he really never had
10 too much to do with the workers.

11 Q What would he do while he was out at the site?

12 A Shoot the breeze with Bob, you know.

13 Q Did he ever shoot the breeze with you?

14 A Yes, once -- you know, I would do certain jobs,
15 but I mean, you know, he always got me when I
16 broke something down, so -- you know.

17 Q Did Frank Churillo ever work out at the site?

18 A Not while I was working there, but I heard he did
19 work. But not while I was there.

20 Q How about Steve Churillo?

21 A No, no. He was a kid then.

22 Q Were there any other supervisory personnel, for
23 want of a better term, out at the U.S. Scrap site
24 other than Bob Bates and Steve when he was there?

25 A No. I was the next one up.

1 Q Okay.

2 A You know, you would -- people would get titles
3 which don't mean nothing.

4 Q Uh huh.

5 A If you were happy being called a "Foreman" or
6 "pusher" or a "boss in the office," you know,
7 you got no better pay than nobody else. So if
8 that's what you -- if you wanted a title to wear
9 on your shirt, sure, you could have a title. But
10 I mean as far as bosses, no.

11 Q Could you give me a general idea of the layout of
12 the U.S. Scrap facility when you started there in
13 '71?

14 A When I started in '71, you would go down the road
15 which was very much lower than what it is now.

16 Q Uh huh.

17 A Okay. You would go down; then up a little hill
18 and then down, and when you got to the grain
19 elevator, where it used to be, there was nothing
20 but swamp out there. On either side of you would
21 be swamp.

22 Q Okay.

23 A It was a narrow piece of property.

24 Q It was a narrow piece running north and south
25 pretty much, right?

1 A Right.

2 Q It ran along --

3 A It ran right along the railroad tracks.

4 Q And the railroad tracks were on the west side of
5 the site?

6 A Right, right.

7 Q Okay, and was the entrance to the site at the
8 north end?

9 A Right.

10 Q Okay.

11 A See, at one time there's only one way in and that
12 was right past Stainless Processing which used to
13 be there --

14 Q Uh huh.

15 A (Continuing) -- and that was the only way in.

16 Q When's the last time you were down at the site?

17 A I was down at the site -- when was they doing
18 some work there? Last work they was doing, I was
19 over there.

20 Q They've been doing work there a lot.

21 A Okay. I don't know. I haven't been there --

22 Q Has it been a number of years?

23 A Sure. Three years ago.

24 Q That Stainless Processing Company was taken over
25 by another company, right?

1 A Yeah.

2 Q Okay. Do you know the name of that company?

3 A No, I don't.

4 Q Does Keywell ring a bell with you?

5 A No, I would have no idea. In fact, I wanted to
6 write the name down because I saw scrap, and I
7 just flew right by. I didn't write the name down.

8 Q You generally described the site. Were there
9 buildings on the site when you started?

10 A When I started, yes.

11 Q Where were the buildings and what were the
12 buildings?

13 A When I started, we had a garage. We had a brick
14 building which was a garage. We had an office
15 trailer. We had a six or seven-story grain
16 elevator building and we had four steel tanks,
17 four concrete tanks in the grain elevator complex,
18 and since then, that's -- only thing there now is,
19 I believe, four tanks, the concrete tanks.

20 Q The four steel tanks and the four concrete tanks
21 were in the area of the grain elevators?

22 A Sure. I took down the steel tanks.

23 Q Okay. Where -- where was the first garage
24 located?

25 A The first building -- you would come down the hill

1 and there was a wooden garage.

2 Q Okay. Is this on the north end of the site?

3 A It would be the west end.

4 Q West end over by the railroad tracks?

5 A Right.

6 Q And what --

7 A The next garage was right behind it.

8 Q That's a brick garage you're talking about?

9 A Brick garage, yeah.

10 Q What were those two garages used for?

11 A Repairing trucks, fixing tires. A place to eat.

12 Q And the office trailer, where was that located?

13 A That was right to the south side of those garages

14 on the small hill.

15 Q And that was basically where the office was kept?

16 A That was the yard office.

17 Q Okay. Who worked in that trailer?

18 A Bob.

19 Q Bob and Linn?

20 A Well, later on Linn, yeah.

21 Q Anybody else work in there besides Bob?

22 A Well, we were in there. I was in there, you know.

23 Q What would you do in there?

24 A Well, at one time I used to run the trucks.

25 Q When you say "ran the trucks," what?

1 A Dispatch them, you know. To me, that's not a
2 dispatcher.

3 Q When did you dispatch the trucks?

4 A I don't know. I was working nights. I don't
5 know. '72, I mean -- or something. I really
6 don't know dates.

7 Q Okay. Were the records for the business trans-
8 actions in connection with the hauling kept in
9 that trailer?

10 A No. We always would keep tickets.

11 Q The trip tickets?

12 A Yeah. We just send them to the office, main
13 office. We don't -- no.

14 Q Who sent them to the main office?

15 A We had somebody run it down there. It could be
16 anybody. It could be Jesus run it down. A truck
17 driver. I would or somebody -- anybody.

18 If you're going out to get a cup of
19 coffee, drop off the tickets.

20 Q Is that the office at 391 East Kensington?

21 A Right, I believe. I don't know. There was two
22 offices.

23 Q Where was the other one?

24 A They had one around the corner up there on --
25 what is that? What street is that up there?

1 Michigan, isn't it? Michigan Avenue up there, up
2 the hill.

3 Q Do you know any building that was around that
4 office? Was there a bar?

5 A They tore that down. It was right across the
6 street from that little mall right out there.

7 Q Okay, and that was torn down?

8 A Michigan Avenue, right.

9 Q Do you recall when that was torn down?

10 A I believe it's torn down, yeah.

11 Q Do you recall when that was --

12 A No.

13 Q Was it while you were still out there?

14 A No, no. All the time I was out there, we was
15 using that office, and when they -- later on,
16 they had moved down on Kensington.

17 Q Okay. You yourself took some of those trip
18 tickets to the office on at least one occasion?

19 A I'm sure I had to, you know.

20 Q Okay. How often were those records taken down
21 to the office?

22 A Well, we would load -- loads would be moved every
23 day, so every day, I imagine, tickets would have
24 to go down. How would you bill customers?

25 Q That was something done on a daily basis?

1 A Sure. How would you bill customers?

2 Q Who did you give the tickets to at the office?

3 A You know, I don't know their name. I never knew
4 the lady there. You know, never paid attention
5 to the lady. I only went there once in a blue
6 moon. You'd have to go check your records or
7 something.

8 Q Can you tell me how the paper work operated in
9 terms of the trip tickets?

10 A Well, it's -- it's a triple ticket, you know,
11 carbon copies on it; and you would go and you'd
12 pick up a load and there's a customer, and he
13 gets a ticket. The office gets two tickets.

14 Q What kind of information goes on that ticket?
15 Say the driver goes to pick up a load of waste.

16 A You put 5,000 gallons on it, company name, 5,000
17 gallons.

18 Q Is there a price that goes on there?

19 A No, no price, no.

20 Q A date?

21 A Date goes on it, and you would have an address,
22 I guess. You would have an area because you
23 have a truck driver, and if you're going to go to
24 Joliet, you would have to have "Joliet" on it,
25 because he'd end up in Deerfield someplace.

1 Q Where does the truck driver get that ticket? Is
2 that given to him?

3 A In the yard.

4 Q In the yard?

5 A In the yard.

6 Q Would Bob give that to him?

7 A Yeah. I would. Linn would.

8 Q Whoever was acting as dispatcher would give it to
9 him?

10 A Whoever was there, you know. Okay. This truck
11 coming in, he's due in in twenty minutes. When
12 he comes in, give him a ticket. That would be
13 anybody. Sometimes we put the name of the driver
14 on it so they would know --

15 Q Uh huh.

16 A (Continuing) -- or the truck number.

17 Q Was your company's name on that trip ticket?

18 A You know, I don't know. I don't know. That I
19 never -- I never paid attention to that.

20 Q Do you know how many companies operated out of
21 that facility at 123rd and Cottage Grove when you
22 worked there?

23 U.S. Scrap Corporation operated there,
24 right?

25 A No -- see, you got to watch out how you word that.

1 Q All right. Correct me.

2 A Because you got U.S. Scrap or Scrap Corporation
3 of America.

4 Q All right.

5 A All right? See? And if you word that right, you
6 can involve them in something. They got nothing
7 to do with it. I mean people --

8 Q Straighten me out here.

9 A U.S. Scrap and U.S. Drum. That was the same
10 company.

11 Q Okay. U.S. Scrap and U.S. Drum are the same
12 company?

13 A Well, I get paid one check --

14 Q Okay.

15 A (Continuing) -- you know, whatever was on the
16 truck. It's none of my business. You could put
17 "Miller" on the truck, whatever you want to put
18 on it.

19 Q The truck operated with certain names on it, right?

20 A U.S. Scrap or U.S. Drum.

21 Q Or U.S. Drum?

22 A Yes.

23 Q Did any of the trucks have Liquid Engineering on
24 them?

25 A No. We were not Liquid Engineering.

1 Q Have you ever heard of Liquid Engineering?

2 A Yes, I did. Yes, sir.

3 Q What is your familiarity with Liquid Engineering?

4 A Well, I know people that went to work there --

5 Q Okay.

6 A (Continuing) -- you know.

7 Q Where was that located?

8 A That was -- I believe it was in Brookfield --

9 Q Who --

10 A (Continuing) -- in the area somewhere in Chicago
11 there.

12 Q Do you know who operated that company?

13 A No, I don't.

14 Q Was that a Steve Martell company?

15 A No, no, no, no. What I believe what happened on
16 that was they, basically, bought accounts, you
17 know, so that's --

18 Q So the only two company names you recall on the
19 trucks that operated out of the facility where
20 you were in 1971 was U.S. Scrap and U.S. Drum?

21 A Yes. As far as I know, yes.

22 Q Was there any distinction made -- strike that.

23 How many trucks were used to pick up
24 waste when you worked there in '71?

25 A I believe we had eight trucks not counting

1 trailers.

2 Q How many trailers?

3 A We could have had 30 trailers.

4 Q The number of trailers would vary?

5 A Sure.

6 Q Okay. Can you describe the trucks for me?

7 A Mack. That's all we had was Mack.

8 Q Okay.

9 A We had one International and all the rest was
10 Mack.

11 Q Were these --

12 A Semis.

13 Q (Continuing) -- semi-tractors?

14 A Yeah. That's what you want to know. Yeah. I
15 take it for granted --

16 MR. KOWALSKI: Off the record.

17 (Discussion omitted from the record.)

18 MR. KOWALSKI:

19 Q Did the number of trucks vary during your time at
20 123rd and Cottage Grove?

21 A Yeah. You would buy two trucks or one truck or --
22 you know -- whatever. You would have one truck
23 in the shop getting fixed and over would come a
24 new truck, you know.

25 Q So that we don't have any trouble with terminology

1 here, Mr. Klepser, when I say "scrap site," I'm
2 referring to the site where you worked --
3 A Right, right.
4 Q (Continuing) -- at 123rd and Cottage Grove, okay?
5 A Okay. Right.
6 Q Okay. Let me backtrack here a bit. You were
7 describing the site for me; describing the garage,
8 the two garages, the office trailer; also the
9 grain elevator where there were, also, four steel
10 tanks and four concrete tanks.
11 A Right, right.
12 Q What was the --
13 A Plus a big building with it.
14 Q Around the grain elevator?
15 A Yeah, up in the front of it.
16 Q Where was the grain elevator located?
17 A South of the trailer.
18 Q Okay.
19 A That would be the southeast of the trailer.
20 Q So that was away from the railroad tracks?
21 A Right, right.
22 Q Okay.
23 A Then, we had a big steel incinerator.
24 Q And where was that located?
25 A That was located just west -- it would be north-

1 west of the grain elevator --

2 Q Okay.

3 A (Continuing) -- of the tanks, you know.

4 Q Was that incinerator ever operated while you were
5 at the site?

6 A Not as long as I had been there. It was cranked
7 up, I believe, once; but -- you know.

8 Q What was the grain elevator used for while you
9 were there?

10 A Well, the grain elevator was used to store copper,
11 and it was used, basically, for storage like that.
12 All right?

13 Now, they make great big doors on it.
14 It was just a mountain of copper inside the tank.

15 Q Was that used for storage of any liquid waste?

16 A Yes. To a small amount, yes.

17 Q Okay. Where was the liquid waste kept in that?

18 A See, that's a touchy one there. All right.

19 There was some drums around it. There was -- you
20 have those concrete tanks in the back. There was
21 some liquids in them.

22 Q Okay. Where were the concrete tanks located with
23 relation to the elevator itself?

24 A Concrete tanks was on the far south side of the
25 property, furthest south that you could go on that

1 property at the time.

2 Q Let me show you, Mr. Klepser, a little diagram
3 I have here of the scrap site. Would that help
4 you at all in explaining the location of various
5 things?

6 A Well, here's the site here. See, I don't know
7 what you have here.

8 Q Okay. This is north up here and this is south.
9 Okay? (Indicating)

10 A Okay. So here's your railroad track.

11 Q Right.

12 A All right. If you want to use -- whatever you
13 want to use for railroad tracks because this here
14 is all different. Your tanks were right here.
15 There's your grain elevator. This is evidently
16 your trailer. I don't know what these are
17 supposed to be. (Indicating)

18 Q Where it says "entrance gate" up here, was that
19 the entrance that was there when you worked there?

20 A Yeah, but there was no gate.

21 Q But that's generally the area?

22 A Well, the road is moved now. We used to come
23 right here. Swamp here, swamp here. See, every-
24 thing's been moved. There was swamp on both
25 sides. Now, what you have here is totally

1 different.

2 MR. KOWALSKI: Okay. Mr. Klepser,
3 before we proceed further, I'm going to let
4 the court reporter mark this as Klepser
5 Deposition Exhibit No. 1 for identification.

6 (Document marked as requested.)

7 MR. KOWALSKI:

8 Q Mr. Klepser, referring to Deposition Exhibit No.
9 1 there, could you indicate for me where the
10 first garage was located on this site?

11 A Okay. According to the way you got it here --
12 right? Presume -- this was all an area -- do you
13 want me to mark on this?

14 Q I'll tell you when I want you to mark on it.

15 A The first garage according to your little plan
16 here, right --

17 Q Uh huh.

18 A (Continuing) -- would be right in here. (Indicating)

19 Q Okay.

20 A You had a garage -- garage. Then, we had a back
21 building in here. A dock which consisted of
22 trailers with a roof on it.

23 Q Okay. Could you mark with a "g" where the first
24 garage was located?

25 A Okay. (Indicating)

1 Q And could you mark with a "g-1" where the second
2 garage was located?

3 A It would be right alongside of it, you know,
4 back of it.

5 Q Put it anywhere there where you can best estimate.

6 A (Indicating)

7 Q Okay. You drew a "g" with a line above it?

8 A Right.

9 Q Okay. Now, you also mentioned the office trailer.
10 Could you put a "t" where the office trailer was
11 located?

12 A Well, I would put it here, but it was straight,
13 so --

14 Q Just --

15 A (Indicating)

16 Q (Continuing) -- with the understanding that the
17 "t" just indicates the general location of where --

18 A The trailer was.

19 Q (Continuing) -- the trailer was located.

20 Okay. Now, if you could, make an "e"
21 where the grain elevator was located.

22 A (Indicating)

23 Q As I understand, the concrete tanks and the steel
24 tanks were located immediately adjacent. They
25 were located going south of the grain elevator?

1 A Uh huh.

2 Q How far apart were those tanks?

3 A Well, they were right together.

4 Q Were they above ground tanks or below ground?

5 A Above ground.

6 Q Can you give me an approximation to the size of
7 those tanks?

8 A Well, it would be 40 foot across, approximately
9 40, 50 foot wide -- or high.

10 Q All right, and the tanks were pretty much the
11 same size?

12 A The concrete tanks were -- four of them that --
13 they're smaller, you know, in diameter. They're
14 like concrete tanks are, like 10 feet across per
15 tank.

16 Q Uh huh, and how tall?

17 A Forty foot.

18 Q Okay.

19 A They're still there. They were there.

20 Q And the 40 x 40 foot tanks were the steel tanks
21 that you were describing?

22 A Right.

23 Q Okay.

24 A And the building was approximately a six or
25 seven-story building.

1 Q Okay, and was that north of the grain elevator?

2 A That was the grain elevator.

3 Q When you say "the building," you mean --

4 A The building was the grain elevator, yeah.

5 Q You say some liquid waste was put into the grain
6 elevator?

7 A Yeah. I seem to vaguely remember a truck dumping
8 into one of them. But at that time, if there's a
9 lot of water, rain, we might even blow a load of
10 water in there because the water --

11 Q Do you know what kind of liquid waste was put
12 into the grain elevator?

13 A No. I wouldn't even attempt to say that.

14 Q Okay.

15 A Honestly, I wouldn't know.

16 Q Okay. Do you know what kind of waste was stored
17 in the concrete tanks?

18 A No.

19 Q Okay. It was liquid waste, though?

20 A Sure. It could have been.

21 Q Do you know what kind of waste was stored in the
22 steel tanks?

23 A Steel tanks had no waste.

24 Q What was in the steel tanks?

25 A Copper.

1 Q Copper.

2 A We had -- there was some drums in there that we

3 had taken out; but I mean there was no -- you

4 know, nothing was dumped, more or less.

5 Q You earlier -- described for me earlier a ramp

6 that was -- is that correct?

7 A Yeah, yeah.

8 Q Where was that ramp located?

9 A Well, the drum operation is here, and we were

10 filling this in. We made a ramp behind this here

11 garage, more or less.

12 Q Uh huh.

13 A There was a drum dumping station. That ramp is

14 up here. (Indicating)

15 Q Can you put a "r" in the area where the ramp is

16 located?

17 A (Indicating)

18 Q Okay. Now, that is also in the area of what you

19 described as the drum dumping operation?

20 A Right, right.

21 Q And could you describe that drum dumping operation

22 for me a little bit?

23 A Sure. You dump a drum into a box here.

24 Q What kind of box?

25 A Steel -- what it was, was a box with a grate on

1 it and you had a hose in the bottom of it.

2 Q Uh huh.

3 A You had a tank in the ground so the grate would
4 stop any of the paint sludges and rubber and
5 gloves and rags and cans from going into that
6 tank.

7 Q Was the function of the ramp so that the truck
8 could back up the ramp to dump the barrels?

9 A No. The ramp was to get rid of the solid debris
10 out of the liquid.

11 Q How was that done?

12 A You push it up and all the liquid would run down
13 and all the garbage would stay up.

14 Q Where would the liquid go?

15 A Into the tank.

16 Q Okay. So you had a steel tank in the ground with
17 a grate on the top of it?

18 A No. You have a steel tank in the ground. You
19 have a box above the ground on the dock that you
20 dump the barrels in with the steel grate on it.
21 So that there was clean -- whatever liquid was
22 going into the tank, so when you vacuumed out the
23 tank, you wouldn't suck a can into the hose --

24 Q I see.

25 A (Continuing) -- because when you did that, you had

1 a problem.

2 Q How big was this tank?

3 A I would say 10,000 gallons.

4 Q And you said that tank, when it got full, would
5 be vacuumed out?

6 A Yeah.

7 Q What would be done with the contents when it was
8 vacuumed out?

9 A Well, disposed of.

10 Q Where was it disposed of?

11 A All over.

12 Q All over the U.S. Scrap site?

13 A Well, it would go on this site and other sites,
14 yeah.

15 Q Okay. Would some of it go to the 9th Avenue site?

16 A Sure.

17 Q What other sites would it go to?

18 A Well, at the time, you had -- you had places you
19 dumped, you know? There was another grain
20 elevator there.

21 Q Okay. Where was that other grain elevator?

22 A Well, that -- according to this here map, it would
23 be over here. Actually, it would be right here,
24 the frontage road that goes alongside here.
25 There's a frontage road. (Indicating)

1 Q So you're saying that other grain elevator was
2 located northeast of the site?

3 A Well, let's see. Yeah, northeast.

4 Q Were there any other pits on the site that were
5 dug for receiving liquid waste other than the
6 tank that you described up by that ramp?

7 A No. The tank was here. That's all. The tank
8 was actually -- here's your ramp. Your tank was
9 right here. Right there was your tank.
10 (Indicating)

11 Q Okay.

12 A Sure.

13 Q Were there any other pits that were used?

14 A Sure.

15 Q Where were those?

16 A All over.

17 Q All over the site?

18 A (Witness nodding head.)

19 Q Okay. Were there more in the north as opposed
20 to the south end of the site or --

21 A No. We tried to make it even.

22 Q Okay.

23 A Dump it -- you know, you take a pit -- see? At
24 one time this here was all under water.
25 (Indicating)

1 Q Referring to the south end of the site?

2 A Right, and at one time over here was under water.

3 (Indicating)

4 Q Okay. That's referring to the east side?

5 A Yeah. So when you fill the ground in, you know,
6 the water dissipates.

7 Q Okay. Was there any separation made as to what
8 kind of waste went to what area of the site?

9 A Well, yes, in -- yes, yes. You could -- you know,
10 we hauled a lot of water. We hauled a lot of
11 sugar water.

12 Q From where?

13 A Well, you would haul from Sara Lee. It's all
14 sweeteners. All right.

15 Rexene Polymers would be nothing but
16 milky water. Plastic -- what they produce, so
17 you have milky water.

18 Q Okay.

19 A Lot of water.

20 Q Okay. But you said there were distinctions made
21 as to what kind of wastes went where. Can you
22 generally describe for me how that distinction --

23 A Sure. If it's water, you would open up the valve.
24 You dump it on the road, you know, before you got
25 down to the office because you had a half mile or

1 so.

2 Q Is that the road next to the site?

3 A Right. You would actually have dust control.

4 Q Dust?

5 A Sure. It's water.

6 Q Okay.

7 A Now, if you had an acid, you couldn't do that.

8 Q Where would the acids go?

9 A Well, the acids would have to go in the ground.

10 Q Okay. They would go in that tank, for example,
11 that you were describing?

12 A You would dump some acid in the tank, yeah. But
13 you couldn't-- see, it's a barrel operation, all
14 right?

15 You couldn't dump acid in that tank
16 because acid would respond different with paint.
17 You find that out the first time you do it, you
18 know, and you take the box apart and, you know,
19 try to clean out the tank --

20 Q So would the acid be dumped directly into the
21 ground?

22 A Sure.

23 Q And any particular area of the site?

24 A No.

25 Q No?

1 A Well, if you had to dig a hole -- right? Because
2 you had a lot of it, if you had to dig a hole,
3 you just run it on the road because it makes it
4 thin.

5 Q Okay.

6 A You just run it on the road.

7 Q How many holes were dug on the site to throw
8 waste into?

9 A Couldn't even start to count.

10 Q Okay. More than a hundred?

11 A Oh, I wouldn't -- if I said "less or more" I
12 wouldn't have a correct answer for you. I would
13 guess that you would say 50 holes. It's -- what
14 do you consider to be a hole? You know, when we
15 spend eight hours digging a hole, it's a hole.

16 Q Well, you tell me. I wasn't out there. When you
17 dug a hole, how deep a hole?

18 A Forty foot down.

19 Q Forty foot deep?

20 A As far as you could reach.

21 Q As far as you could reach with what?

22 A With a back-hoe.

23 Q How wide would those holes be?

24 A Forty foot, or you would make it 20 feet. It
25 depends on what you're putting in.

1 Q Sure. Would a hole be dug for an individual load
2 if it was a big load?

3 A Sure -- well, not necessarily, no.

4 Q Okay.

5 A Not unless you had to have the truck because
6 that's a waste of time.

7 Q So if you're expecting several big loads, you
8 might be asked to dig a hole and --

9 A No, because, see, U.S. Drum was a drum processing
10 company.

11 Q Uh huh.

12 A So you don't want to -- you don't want to lose
13 the drum; only if the drum can't be used, you
14 know.

15 If it was solid, you couldn't use it.

16 If it was -- you know, you hit the drum. You tap
17 on the side of the drum and if it's halfway solid
18 on the bottom, that drum's no good.

19 Q So would you throw the whole drum into the pit?

20 A Throw the whole drum away.

21 Q Would that go into the pit with the liquid?

22 A Sure.

23 We was a drum recovery company so --
24 we also recovered drums. There was big money in
25 drums.

1 Q Sure. You would empty out the waste in the one
2 tank you were talking about and recycle the drum.
3 You would vacuum out the tank and you would either
4 put it in the ground or take it over to 9th
5 Avenue?

6 A Yeah.

7 Q So basically, these holes varied in size, but
8 they're usually pretty big to justify your time
9 in digging them?

10 A You know, you could make a slip, okay?

11 Q Uh huh.

12 A Eight, nine foot wide, 40 foot deep, and it might
13 be, you know, like you say, enough for five, six
14 loads, ten loads, you know?

15 Q And you can't give me an exact number, but you'd
16 say around 50 at least?

17 A Sure. I left there, you know. There would be
18 times we wouldn't have to dig a hole for months.
19 It's uncalled for because you don't have no
20 problem because all the drums are good rums.
21 You know, there was no problem.

22 Q You told me you worked as a dispatcher for a
23 period of time in 1972.

24 A Well, that's the title you would put on it.

25 Q You basically assigned trucks to pick up loads,

1 right?

2 A Right, right.

3 Q How long a period of time did you do that?

4 A Oh, I don't know. I worked at night for -- you
5 know, for three, four months, I think. I don't
6 know because I no sooner started at night and
7 then, they wanted me to work in the daytime. I
8 just get used to that and I'm back on nights
9 again. I even drove trucks. You know, I just
10 get fed up and tell them, "I'm an operator. I
11 don't want to be doing this."

12 Q How long did you drive the truck?

13 A I only drove the truck when it was necessary. A
14 driver didn't show up or an account calls in, you
15 have to go out and get another load.

16 Q When you say when it was necessary, when they had
17 a load to be picked up and no other driver --

18 A No other driver and everybody's out.

19 Q Can you give me an estimate how many times you did
20 that?

21 A I might have picked up 50 -- 50 loads or so.

22 Q During those 50 loads or so you picked up -- well,
23 strike that. Let me go back to your time as a
24 dispatcher.

25 Would you get a call from the company to

1 pick up the waste or how did that operate?

2 A Sure, sure.

3 Q Okay.

4 A Well, yeah. You would -- you would have your
5 companies, and if it's slow, you would call up
6 companies and ask them if they got any loads.
7 But normally, what you did, you just turn around
8 and they call you in, because most of your
9 companies worked around the clock. They call you
10 in when their tank is full. When they call you
11 in, their tank is full.

12 Q Since you did work as a dispatcher for a time --
13 you worked as a driver for a time. I'm just
14 going to show you a collection of documents here
15 on some graph paper. Have you ever seen that
16 before? (Indicating)

17 A You mean like this here?

18 Q Yes.

19 A Yeah, my wife does it all the time. Spends my
20 money.

21 Q Specifically, have you ever seen this list with
22 these companies?

23 A Oh, no. I wouldn't -- you know, I'm not a good
24 reader or nothing.

25 Q All right.

1 A Okay? And so, I really wouldn't be able to tell
2 you --

3 Q All right.

4 A (Continuing) -- because there's so many companies
5 that -- you know.

6 Q Okay. Mr. Klepser, I'm -- instead of straining
7 your memory right now for companies that U.S.
8 Scrap picked up from and that were taken to both
9 9th Avenue and U.S. Scrap, I'm going to read some
10 names for you --

11 A Okay.

12 Q (Continuing) -- and just see what you remember
13 about these companies.

14 A Okay. If you read the names, I'll remember them.

15 Q Okay. A company called Accutronics?

16 A No, I don't.

17 Q Okay. Allis Chalmers?

18 A Yes, I do.

19 Q Okay. Do you recall where they were located?

20 A Right there in Harvey. Halsted makes a split --

21 Q Uh huh.

22 A Okay. Well, take Halsted down and just before you
23 go underneath a viaduct, just before the split --

24 No, that was the split already. Okay. It's right
25 off of Halsted. Anyway, it's at --

- 1 Q That's fine. Did you ever go there yourself?
- 2 A I went there many times.
- 3 Q Oh, you did go there many times?
- 4 A Many times.
- 5 Q What kind of waste did you pick up there?
- 6 A Water soluble oil.
- 7 Q Okay, and did that waste go to both the U.S.
- 8 Scrap and 9th Avenue sites?
- 9 A I believe it was U.S. Scrap. The majority -- 90
- 10 percent I would have to say that.
- 11 Q Okay.
- 12 A On that, yes.
- 13 Q Did you during the time you either acted as a
- 14 driver or as a dispatcher, did you either haul
- 15 yourself waste to 9th Avenue or did you dispatch
- 16 it to 9th Avenue?
- 17 A Both.
- 18 Q Okay. American Can Company?
- 19 A Yeah.
- 20 Q Okay. Do you recall where those facilities were
- 21 located?
- 22 A American Can?
- 23 Q Right.
- 24 A LaPorte.
- 25 Q Okay. Do you recall a facility on Western Avenue?

1 A I know of the plant, but -- you know --

2 Q Okay.

3 A I never went to it, so I don't recall at the
4 moment.

5 Q Okay. If you don't recall, you know, any of this,
6 just tell me that and we'll move on.

7 Do you recall the facility in Hammond
8 having waste hauled for it; Hammond, Indiana here?
9 No?

10 A No.

11 Q How about Maywood?

12 A Well, what was the name of the company?

13 Q These are all for American Can Company.

14 A Oh, no. You know -- Maywood, yes, I heard of it,
15 but not me.

16 Q Okay.

17 A Maywood, we had a colored driver. He knew it.

18 Q So he picked up the waste?

19 A Yeah. We would say "American Can, Maywood" or
20 "LaPorte" or whatever it was.

21 Q How about Barrington; do you recall that waste
22 was picked up at the Barrington facility?

23 A No, I don't.

24 Q Do you recall what kind of waste American Can
25 produced?

1 A Water and oil.

2 Q Water and oil. Do you recall where that was
3 taken? Was that taken to both U.S. Scrap and 9th
4 Avenue?

5 A I would say so. It depends on the weather at the
6 time. We had low land here.

7 Q Okay. "Here" being the U.S. Scrap site?

8 A Yeah. We had low land, so if the water level is
9 high, you don't benefit putting water there
10 because it don't -- don't dissipate. It don't go
11 nowhere.

12 Q How about American Nameplate, does that company
13 ring a bell?

14 A No, no.

15 Q American Rivet?

16 A American Rivet?

17 Q R-i-v-e-t.

18 A Where was it at?

19 Q I don't know.

20 A Okay, 'cause there's one in Blue Island.

21 Q In Blue Island?

22 A I don't know if that's it or not. I think that
23 was a wire joint.

24 See, I couldn't say yes or no on that
25 because I went into places, but I don't remember

1 where the heck they were.

2 Q Do you recall what they produced -- the company
3 in Blue Island -- what kind of waste?

4 A It was spun acid. That's what they always called
5 it.

6 Q Was that taken to both the Scrap and the 9th
7 Avenue sites?

8 A I would have to say yes. I believe -- I know it
9 was Scrap, but there were times that loads would
10 be taken out. See, we had a storage facility,
11 also.

12 Q Where was that?

13 A At Scrap. All right. So we would fill up tanks
14 in the yard --

15 Q Uh huh.

16 A (Continuing) -- and keep our trucks out running
17 so whenever the truck got loose, we would have
18 him run loads, but you lost track of the loads.

19 Q When the truck got loose and you had him run
20 loads, you mean you would empty it out at U.S.
21 Scrap and take it out to 9th Avenue?

22 A Sure.

23 Q So if I understand correctly, depending on weather
24 and other conditions, business conditions, some-
25 times it would be taken directly from the company

1 to 9th Avenue and, sometimes, it would be mixed
2 in a holding tank at Scrap and taken over to 9th
3 Avenue?

4 A Sure, or done there. It depends on the weather,
5 right.

6 Q Okay. Anderson Manufacturing Company?

7 A (No response)

8 Q Doesn't sound familiar?

9 A Not unless I know where it's at.

10 Q Okay. If I'm understanding correctly, you might
11 not know of them -- of these names?

12 A I might not know the name, but when you say what
13 city, I probably know that.

14 Q The fact that you don't know the name doesn't
15 necessarily mean that they were not a customer,
16 is that correct?

17 A Right.

18 Q John L. Armitage Company?

19 A Don't ring a bell.

20 Q Ashland Chemical in Calumet City?

21 A I know we hauled from Ashland Chemical. I believe
22 it was Calumet City, but I couldn't honestly tell
23 you. You know, there was a couple of them.

24 Q A couple different facilities?

25 A As far as I know, yeah.

1 See, that was on drums. A lot of drum
2 loads was -- 90 percent was during the day, and I
3 wouldn't have nothing to do with it at that
4 period of time.

5 Q I see. Because --

6 A During the day.

7 Q When you were working --

8 Right, because if I took over in the evening or
9 something, I would have something to do with it,
10 but during the day, I just -- you know -- I know
11 we got Ashland Chemical drums.

12 Q Okay. Do you recall what kind of waste Ashland
13 Chemical produced?

14 A No. Paint and what not, I would say paint.

15 Q Were they a pretty big customer?

16 A I would -- I would think so. If you got one load
17 a month on a trailer, that's 72 drums. That's a
18 pretty good customer.

19 Q Before I go on, Mr. Klepser, maybe I can save us
20 a little bit of time. Do you recall especially
21 big customers that you would haul for or that --

22 A Well, yes. I got customers that we hauled for
23 that I liked.

24 Q Okay.

25 A You know, that's mostly where my work came in.

1 Rexene Polymers out of Joliet. Like I said,
2 Sara Lee.

3 Q What was Rexene Polymers' waste?

4 A Milky water.

5 Q Okay. What was it produced from?

6 A Plastic.

7 Q Plastic manufacturing process?

8 A Right, right.

9 Q Okay.

10 A A beautiful account.

11 Q When you say "beautiful," they were a big account?

12 A They were a big account. If we wasn't doing
13 nothing that night, I would look on my sheet and
14 I would only have, like, six loads for the night,
15 and I would call them up and they would give me
16 six more loads.

17 Q Uh huh.

18 A I loved that account, I mean, 'cause then I didn't
19 have to sit around all night. You know, I had
20 things moving.

21 Q As a driver, were you paid based on how much you
22 picked up?

23 A No. I got -- I've always made money, you know, in
24 my own mind. I got paid by the hour and it -- you
25 know, you get incentives. I make my own. You

1 know, I was the operator. So nobody else was an
2 operator. So, you know, if I didn't do anything,
3 you don't --

4 Q Okay.

5 A To my knowledge --

6 Q Sara Lee Foods, you said, was also a big account?

7 A Yeah. I -- that was what I would call sugar
8 waters, pastries.

9 Q Food wastes?

10 A Yes.

11 Q Was there any kind of chemical wastes that you
12 know of?

13 A No. There was some stinking stuff, but it was
14 their frostings and everything.

15 Q Which Sara Lee facility or facilities did you
16 pick up at?

17 A I think it was Deerfield, or another one --
18 another one was MacLean-Fogg, and they made -- I
19 believe they made bolts or nuts -- or nuts, and I
20 liked that account and I don't -- now, I get them
21 mixed up.

22 One was far north side of Chicago. One
23 was in Deerfield, and I don't know which one it
24 was.

25 Q That's MacLean-Fogg?

1 A Yeah.

2 Q And what kind of wastes did they generate?

3 A It was oil-water, you know. You would get heavy
4 oil. It depends on how the cutting machine was
5 and it depends on how their treatment plant was
6 working. You know, if you could suck off a lot
7 of their water, it's less loads. They were
8 getting rid of the oil, not so much the water as
9 much as the oil. You would naturally -- you love
10 to go in there and just pump out water. That's
11 business, you know, because the next day they got
12 the oil again.

13 You would have to send two trucks to
14 clean them out and that would get all the oil out.
15 Now --

16 Q What other big customers do you recall?

17 A Well, you had Clark Oil.

18 Q Clark Oil?

19 A That was a nice one.

20 Q And what kind of waste did they generate?

21 A We had water and oil, diesel fuel. You know, they
22 had a storage tank. We call it canal -- on the
23 canal. We would pull up to it and just load it.
24 That was a nice account because it was clean, you
25 know, in and out. That was nice; and you had

1 Chicago Spring & Wire. That was over here on --
2 by 103rd, and that was -- I only went there once.
3 That was acid. You know, I didn't get a chance
4 to go there -- to too many accounts.

5 The only time I went is when I worked at
6 night and we were short of drivers, you know.

7 Q All the accounts you've mentioned so far, as far
8 as you know, did the wastes go to both Scrap and
9 9th Avenue?

10 A Well, I have to say yes. I can't say no on that
11 because, you know, at first everything went to
12 one site; and after that, it went to a second
13 site.

14 Q Uh huh. So once the 9th Avenue site was opened,
15 most of the waste went to both sites?

16 A Sure.

17 Q Okay. Continue if you can recall.

18 A Well --

19 Q Other --

20 A We did Clark Oil.

21 Q (Continuing) -- accounts.

22 A We also cleaned out one of their tanks. All right.
23 And that was -- you know, it was like three foot
24 deep. We used to take a -- when you take a tank
25 160 foot across, you got a good-sized tank.

1 Q What was in the tank?

2 A You got a lot of loads.

3 Heavy oil, tar oil. Oil bottoms out.
4 Crude oil does. It's just like a heavy tar.
5 had to vacuum it out with a Vac-all and put it in
6 a pit and actually heat it in order to pump it
7 into trucks.

8 Q What other companies?

9 A We had companies all over, you know.

10 Q Okay. Let me --

11 A Like I say, at that time I was interested in
12 doing my operating more than anything else. You
13 know, I'd help maintain trucks, what not, to fill
14 in. But that's what I wanted to do was operate.
15 I didn't want to --

16 Q Is your familiarity with the customers based
17 mostly on the time you spent as a dispatcher --

18 A Right.

19 Q (Continuing) -- or the time as a driver?

20 A Or if I had to go out there and correct the
21 problem.

22 Q Would you also learn about other customers just
23 by talking to drivers and things you overheard?

24 A Oh, yeah, yeah. But you don't -- that many years
25 ago, you know, I get into another field. My mind

I seem to remember it, but I don't know.

Magee?

No, I don't remember that.

Here's one you mentioned earlier, Rexene Polymers.

Right. Bulk loads. All bulk loads.

Were they chemical loads?

Water and milky water is what it was to me.

Plastics.

Where were they located again?

They were located the other side of Joliet.

And did that waste go to both sites?

Yes.

Illinois Tool Works?

Don't recall it.

Brightly Galvanized?

Yeah. If it was drums or bulk, I don't remember.

Do you recall what kind of wastes it was?

No.

Do you know if it was an acid solution?

I don't -- I couldn't tell you. I think it would be.

Did that waste go to both sites?

It would have to.

Next company is Continental Cleaning.

No, I don't remember them.

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--

1 A No.

2 Q Boltmaster?

3 A That sounds familiar. Sealmaster, was it, or
4 Boltmaster?

5 Q Boltmaster.

6 A See, in terminology, it might be changed with the
7 driver. I remember a Sealmaster. Boltmaster
8 could have been the same thing or -- it's on the
9 list? It might be another one.

10 Q Very well might. How about Boyar Schultz?

11 A No.

12 Q Cargill?

13 A No.

14 Q Cellofilm? Cellofilm?

15 A No.

16 Q Chicago Adhesive?

17 A Where are they located?

18 Q I don't know.

19 A I'm trying to remember. We used to have roll-off
20 trucks, too. Roll-off trucks, garbage trucks.
21 We used to pick up from one like that.

22 Q Okay. It's fair to say again that these might
23 have very well been customers, but you just --

24 A Very possible.

25 Q (Continuing) -- you don't recognize the names?

1 A Very possible, yes.

2 Q With that premise, I'll continue and you just tell
3 me --

4 A The ones I know.

5 Q (Continuing) -- the ones you remember specifically
6 as being customers, okay?

7 A Okay.

8 Q Do you remember Chicago Decal?

9 A No.

10 Q Chicago Nameplate?

11 A Not honestly, no.

12 Q Chicago Roto Print?

13 A No.

14 Q Commander Packaging?

15 A No.

16 Q Continental Can?

17 A Yeah.

18 Q Okay. I have here addresses on 65th and one at
19 Kilpatrick. Do you recall those facilities?

20 A 65th, I recall.

21 Q Do you recall what kind of wastes they generated?

22 A No, I don't, because if I would send the truck
23 out -- see, a lot of times I would have tickets
24 already made out. All right. They would make
25 them all out for me -- all right -- and as my

1 night crew come on, I would start handing out the
2 tickets to whoever was familiar with the job.

3 Q Okay. How about Contour Saws?

4 A No.

5 Q Cook County Hospital?

6 A Yeah, I heard that.

7 Q Do you recall what kind of waste was picked up
8 there?

9 A Weird.

10 Q Do you recall anything specifically?

11 A If it's the same account I'm thinking of, it was
12 a very bad material.

13 Q Was it radioactive wastes?

14 A No, I wouldn't know that. I knew that it was --
15 it would catch on fire.

16 Q Okay.

17 A It was all little bottles if it's the same place.

18 Q Okay. C. P. Clark?

19 A No.

20 Q Desoto?

21 A Yeah.

22 Q Was this a Kostner -- Kostner facility? You don't
23 know?

24 A I don't know.

25 Q How about a Chicago Heights facility?

1 A Oh, on Desoto, you mean?

2 Q Yes.

3 A Yes. I didn't understand what you mean on that.
4 There was a few sites that we picked up from.
5 One was the Heights, and, probably, Kostner, also.
6 I know when it was -- you had to make sure that
7 you told the driver where.

8 Although it was written on the ticket,
9 you had to make sure because the driver would go
10 the other way and an hour and a half later, he's
11 at the wrong place, so we -- there was two or
12 three different Desotos.

13 Q Do you recall what kind of waste was picked up
14 there?

15 A Drums of rubber. I mean, like, liquid rubber.
16 I mean it was bad liquid rubber.

17 Q So that again would go to both Scrap and 9th
18 Avenue?

19 A No. That would go into here and put into the
20 tank or I would push it up.

21 Q When you say "here," you mean U.S. Scrap?

22 A U.S. Scrap. I'm sorry.

23 Q R. R. Donnelley?

24 A Yeah.

25 Q Do you know which facility that was?

1 A I think they had a couple of them.

2 Q Mattoon, Illinois?

3 A Yeah, yeah.

4 Q Do you know what kind of wastes they generated?

5 A Drums.

6 Q Do you know what was in the drums?

7 A Then again, I couldn't give you an honest answer
8 because, usually, we had accounts that the people
9 were happy with when the drums come in 'cause
10 they could unload a trailer in an hour. They
11 were happy.

12 Then we had accounts they hated to see,
13 you know, like Desoto, they didn't like. They
14 probably liked the other one.

15 I know Mattoon for the simple reason
16 we would lose the truck for a long time. That
17 would hurt.

18 Q Would -- when you say "drums," would that be
19 drums of liquid waste?

20 A Right.

21 Q Would that also go to both Scrap and 9th Avenue?

22 A No. All drums would go to Scrap and where the
23 liquid went after that -- yes, it would probably
24 be both sites.

25 Q Ecko Products?

- 1 A That rings a bell. It sounds familiar to me.
- 2 Q Do you know anything more about it?
- 3 A No.
- 4 Q Elgin Machine?
- 5 A No.
- 6 Q Federal Tool & Plastics?
- 7 A No.
- 8 Q Flint?
- 9 A Flint Ink? Yeah.
- 10 Q Flint Ink?
- 11 A Right.
- 12 Q Do you know where they were located?
- 13 A Not honestly, no.
- 14 Q Do you know what kind of wastes they generated?
- 15 A Well, it says in the name. Ink.
- 16 Q Does this refresh your recollection? Was it
- 17 Broadview?
- 18 A Very possible. I don't --
- 19 Q You don't know?
- 20 A There you go to the drum trucks again. I didn't
- 21 get a chance to dispatch too many drum trucks
- 22 because -- you know.
- 23 Q Okay. Fox Valley?
- 24 A (No response)
- 25 Q No?

1 A No. I'm sorry.

2 Q Furnas?

3 A No.

4 Q C. P. Hall?

5 A No.

6 Q Heritage Ink?

7 A No.

8 Q Howell?

9 A I believe it was Howell Tractor. I recall one of
10 the drivers, you know, mentioning -- we didn't
11 like them. The truck drivers didn't like it.

12 Q Why is that?

13 A Well, he might have had to roll the drums or,
14 maybe, he had to stretch out hose. Then, see, I
15 believe you're talking about a lot of drum
16 accounts. All right.

17 The drum accounts were, basically, out
18 of my hands. I would hear over -- you know,
19 periods, and I would know, but I would not handle
20 them.

21 Q Okay. Do you know what kind of wastes Howell
22 Tractor generated?

23 A No, I didn't.

24 Q Do you know where their facility is located?

25 A Not honestly, no.

- 1 Q J. M. Huber?
- 2 A No.
- 3 Q Hygrade Foods?
- 4 A No.
- 5 Q Intaglio?
- 6 A No.
- 7 Q KHS Company?
- 8 A No.
- 9 Q LaSalle National Bank?
- 10 A No.
- 11 Q McWhorter Chemical?
- 12 A No.
- 13 Q Mobil Oil?
- 14 A Yes.
- 15 Q Was that facility in Cicero or on Cicero?
- 16 A I don't know which one, but I believe it was the
- 17 one on Cicero --
- 18 Q Okay.
- 19 A (Continuing) -- at the time. Okay? You know?
- 20 Q Do you recall if they were a large account?
- 21 A No, I don't because there again, I didn't
- 22 dispatch any trucks there.
- 23 Q Okay.
- 24 A It was a daytime operation.
- 25 Q Do you know what kind of waste they generated?

1 A I know what refineries have.

2 Q But specifically, Mobil Oil, do you recall?

3 A It would be -- it would have to be oil. I would--

4 you know? There's a lot of reasons they get rid

5 of oil.

6 Q Okay. Would that again go to both sites, to the

7 best of your knowledge?

8 A Yeah, I'd probably have to say that.

9 Q Modine Manufacturing?

10 A It rings a bell, but not something I could swear

11 to.

12 Q Morton Chemical? Morton Chemical?

13 A That sounds familiar but --

14 Q Okay.

15 A (Continuing) -- I'm not sure.

16 Q The facilities I have listed are in Ringwood and

17 Elk Grove Village.

18 A We did haul from Elk Grove Village, but what

19 account I don't --

20 Q And you don't know what wastes they generated?

21 A No.

22 Q Namsco?

23 A No.

24 Q National Can?

25 A Yes.

1 Q Do you recall where the facilities were located
2 for National Can?

3 A I knew about the one in LaPorte.

4 Q Okay.

5 A Okay. I don't know -- I never was down to the
6 other one. I know where it's at, but, in fact, I
7 think I did -- I did send some trucks out to
8 National Can. I believe it was on 47th Street
9 or something like that.

10 Q 51st, perhaps?

11 A 51st and Central -- Harlem and Central or some-
12 thing.

13 Q Do you recall a facility --

14 A I recall sending a truck there.

15 Q Do you recall facilities in Melrose Park?

16 A No.

17 Q How about on Kedzie?

18 A We had a building on Kedzie. I don't think it
19 was the National Can. It was -- I know it's a
20 weird name. They got caught dumping in a sewer.
21 You know, we went and cleaned them up. I forget
22 what it was.

23 Q Do you recall what kind of wastes National Can
24 generated?

25 A I would have to say water and oil because, see,

1 their basic thing is water and oil. That's the
2 basic thing they have.

3 Q Do you know what process that waste is generated
4 from?

5 A Running the cans, painting the cans. Oil and
6 paint and water and the slitting of the material,
7 you got oil and water. The washing of the
8 material, you know, whatever chemical they use
9 to wash it to get the oil and water off of it.

10 Q Were they a pretty big account?

11 A Sure. National Can was all right.

12 Q And did that waste go to both sites?

13 A Well, I'd say yeah because, you know, like I say--
14 I'm not a hundred percent sure.

15 I -- I wasn't always into the dispatching.
16 When I was working trucks, I was working trucks
17 in and out, in and out all day long. You know,
18 it's -- it's not something that you really know.

19 Q Let me move on here with some other companies.
20 Pierce-Stevens?

21 A No.

22 Q Poncher Industries?

23 A No.

24 Q Rauland, R-a-u-l-a-n-d?

25 A No.

- 1 Q Richardson Graphics?
- 2 A No, not unless I knew the area and that might
- 3 help me.
- 4 Q Let me backtrack on Rauland. It was Rauland Tube,
- 5 a Division of Zenith.
- 6 A Right. Rauland, we hauled from them.
- 7 Q Do you recall where they were located?
- 8 A No. I think it was two companies. We hauled for
- 9 them. One was way out. We lost a truck for
- 10 quite a while on that.
- 11 Q Do you recall what kind of waste Rauland had?
- 12 A I think it was drums. Sometimes, see, you have
- 13 drums and then you would send tankers up later.
- 14 Q Do you know what was in the drums?
- 15 A No.
- 16 Q How about a company called R-Lite?
- 17 A No, not familiar.
- 18 Q Rustoleum?
- 19 A Rustoleum? Yes.
- 20 Q And was Rustoleum a pretty big account?
- 21 A I really don't know. Then, again, a lot of drums--
- 22 Q Do you know where the facility was located?
- 23 A No, I don't.
- 24 Q Do you know what was in the drums?
- 25 A No.

1 Q Reflector Hardware?

2 A No.

3 Q Schmigal?

4 A No.

5 Q Scholle?

6 A No.

7 Q Shakeproof?

8 A No.

9 Q Skil Tool?

10 A I couldn't honestly say. I say no on that.

11 Q Size Control?

12 A No.

13 Q Standard T. Chemical?

14 A Sounds familiar.

15 Q Would it help if I said "a Division of Montgomery

16 Ward's"?

17 A See -- you see what you got here is the drums.

18 You know, I keep saying that. You got the drums

19 and I was not too much into it with the drums.

20 That's why I don't recall these names.

21 Q Okay. Sommer-Maca?

22 A No.

23 Q Sun Chemical?

24 A Yes.

25 Q Do you recall where Sun Chemical was?

1 A Northlake, and the other one was -- it was just
2 there right off of --

3 Q 65th Street?

4 A Yeah, right.

5 Q Do you recall a facility in Lyons?

6 A No, I didn't go to that one.

7 Q Do you recall what kind of wastes Sun Chemical
8 generated?

9 A Paint -- paint, and we would take bulk loads, too,
10 but a lot of drums. Paint.

11 Q Would that go to both sites again in terms of
12 liquid?

13 A Yes, I would have to say, because the liquid, like
14 I say, went in the ground. The majority went on
15 that site there, the Illinois site.

16 Q U.S. Scrap?

17 A Right.

18 Q How about Thiel-Indall?

19 A Where was it?

20 Q I don't know.

21 A Okay. No.

22 Q U.S. Steel Products?

23 A No.

24 Q UPS?

25 A No.

1 Q Velsicol?

2 A No.

3 Q Victor Gasket?

4 A No.

5 Q No?

6 A No.

7 Q Wilson Sporting Goods?

8 A No.

9 Q William Wrigley?

10 A No.

11 Q Uniroyal?

12 A Uniroyal? Yes.

13 Q And was that in Mishawaka, Indiana?

14 A Yeah. See, then again, Uniroyal was a slow
15 loader. You know, they would have two loads, and
16 we would have to back up, you know. I recall
17 these because of the losing of the truck and, you
18 know, you get very ticked off because you got
19 other customers calling and you lose a truck for
20 one load and you could pick up three loads.

21 Q What kind of waste did Uniroyal generate?

22 A Uniroyal was bad rubber, liquid rubber; and then,
23 it would be -- sometime it would come out like a
24 thinner, the black, you know, and the drum would
25 be half solid or whatever.

1 Q Would that be taken to both sites?

2 A Yes.

3 Q And they were a pretty big account, is that
4 right?

5 A Decent account, yeah.

6 Well, you go according to the list and
7 you'll see them repeated, repeated, repeated.

8 So --

9 Q Union Camp is the next company.

10 A Don't recall it.

11 Q Xerox?

12 A I recall it, but I -- yeah. I got screwed up on
13 that account.

14 Q Okay. Do you recall where that was located?

15 A That was right off -- I went the wrong way.

16 It's right off of the Toll road, I believe.

17 That would be -- right at the toll booth, you
18 look at the factory right there.

19 Q Is that on the north side?

20 A It's on the north side. I don't know what little
21 city it's in. I just know I had to pull my hair
22 out to get to it.

23 Q Do you recall what kind of wastes it generated?

24 A I had a tanker, so it was liquid.

25 Q Would that go to both sites?

1 A After a time, I took -- there was only one time
2 for me, and I went to the wrong one, so I had to
3 go -- you know, no. That didn't go but to one
4 site. Our site.

5 Q It went to the U.S. Scrap site at one time?

6 A U.S. Scrap. I say "our site."

7 Q You don't know if there were other pickups that
8 would have to go to 9th Avenue?

9 A I don't know. I just got a little screwed up on
10 that. I had to go get it.

11 Q The next company is Illinois Bronze?

12 A No. They wouldn't let me near that. If we had
13 that, I couldn't get near it. I'm a scrap man,
14 so they ain't going to let me near that.

15 Q Pyle -- Pyle National; P-y-l-e?

16 A No.

17 Q Chicago Metals?

18 A No.

19 Q Armstrong Chemical?

20 A Can't recall it.

21 Q Adcraft?

22 A No.

23 Q Bretford Manufacturing?

24 A No.

25 Q B & T Plastics?

1 A Where were they located?

2 Q I'm not sure.

3 A If they were, they were a plastic company, but I
4 don't recall where.

5 Q Central Scientific?

6 A No.

7 Q Chemical Trust?

8 A No.

9 Q Conservative Chemical?

10 A No.

11 Q CPC International?

12 A No.

13 Q Corn Products Company? Is that what it would
14 stand for?

15 A I don't know.

16 Q Croname? Croname? C-r-o-n-a-m-e?

17 A I don't know. That could be a chromium plant or
18 where they chrome bumpers. We did have some of
19 them, but I don't recall the name of them.

20 Q How about D-e-s-a Industries, Desa or Desa?

21 A I don't recall it.

22 Q No. Okay. Elliott Paint?

23 A Don't recall it.

24 Q Felt Products?

25 A No, I don't.

1 Q Gard Industries?

2 A No.

3 Q Graph-On?

4 A No.

5 Q Hannah?

6 A What?

7 Q Hannah.

8 A Hannah sounds familiar. They was complaining of

9 the drivers. It sounds familiar.

10 Q Okay. You don't know anything else about it?

11 A No, no.

12 Q How about Hausner Hard Chrome?

13 A I know we had some chrome places. There was

14 certain trucks I couldn't send.

15 Q But you don't recall that certain name?

16 A No.

17 Q Heat Bath?

18 A No.

19 Q J & S Tin Mill?

20 A Where were they located?

21 Q Don't know.

22 A Okay. You don't know if that's in Blue Island or

23 not?

24 Q No.

25 A No.

1 Q Maas & Waldstein?

2 A No.

3 Q No?

4 A No.

5 Q Midwest Electric?

6 A Yes.

7 Q Okay. Do you recall where they were located?

8 A No, I don't. I just recall they had to go there.

9 I didn't go there; but sending the trucks out.

10 Q Do you recall what kind of wastes they generated?

11 A I don't know. I don't know if it was a bulk load

12 or drum load. If that's the actual record, it

13 should have the amount of drums. If it is, the

14 record should have the amount of drums and that

15 would tell you the drum load or not.

16 Q Mirror Reflector is the next company.

17 A No.

18 Q National Bronze?

19 A No.

20 Q Northwest Screen Print?

21 A No.

22 Q No?

23 A No.

24 Q Northwestern University?

25 A I -- you know, we got those drums. I don't know

1 where they come from. Where -- was it the
2 University, or if it was -- the one before that,
3 you know, the hospital? They was always looking
4 for some fingers.

5 Q Owens-Corning?

6 A Yes.

7 Q Do you know where their facility was?

8 A No.

9 Q Do you know what their waste was?

10 A Drums, I believe.

11 Q When I ask what kind of waste, it's helpful when
12 you say whether it's drums or bulk.

13 A Okay.

14 Q But if you also have additional information
15 regarding what was in the drums, that would be
16 helpful.

17 A Very few accounts would I know what was in the
18 drums.

19 Q That's fine. Okay. Just tell me that. Say that
20 you don't know what was in them. Okay.

21 How about a company called Rockola?

22 A I'm not familiar with it.

23 Q Rohm & Haas?

24 A No.

25 Q Rollprint Package Products?

1 A No.

2 Q Specialty Coatings?

3 A It sounds very familiar. Drums, it should have
4 been.

5 Q You don't recall where they were located?

6 A No, I don't.

7 Q You don't recall what was in the drums?

8 A No.

9 Q Stauffer Chemical?

10 A Yes, yes. Good account.

11 Q Where were they?

12 A Stauffer Chemical, I think, was in the Heights.

13 Q Do you recall --

14 A Stauffer or Stauffer. It's the same.

15 Q Do you recall what kind of wastes it was?

16 A Drums.

17 Q Do you recall what was in the drums?

18 A No.

19 Q When you say it was a good account, do you mean --

20 A Good account meant they shipped you a lot of loads.

21 Good account also meant that it was good liquid.

22 It just pours right out of the drums.

23 Q The next company is Transport Service.

24 A I think I know of them. What it was, I don't
25 recall.

1 Q Would it refresh your recollection if I told you
2 it was generating wash chemicals from cleaning
3 out tankers and trailers?

4 A Okay. We done them. Yeah, okay.

5 Q Do you recall where they were located?

6 A The tank wash? There was one that was here in --
7 what is it? Down right over here, right next
8 door to us.

9 Q Hammond, Gary?

10 A No, no, no. Burnham. Burnham had a truck wash
11 and we cleaned that one out and we cleaned
12 another one out, and I don't recall the name of
13 it; and you got one here in Lansing, I believe,
14 and we -- I think we used to do that one. I'm
15 not sure.

16 Q Okay. How about a company called Penray?

17 A No.

18 Q Triple S. Etchants?

19 A No.

20 Q Wilson & Company?

21 A No.

22 Q Wyco Tool?

23 A No.

24 Q Abbott Laboratories?

25 A I can't say. I know of it, but I don't know if

1 we hauled or not.

2 Q Advance Transformer?

3 A I don't know.

4 Q Alco-Graver?

5 A No.

6 Q That's A-l-c-o-G-r-a-v-e-r.

7 A It just don't ring a bell with me.

8 Q Betz Lab? B-e-t-z.

9 A No. *Glidden*

10 Q Big Ben?

11 A No.

12 Q Calumet Screw Machine?

13 A No.

14 Q Central Solvent?

15 A No.

16 Q Cuneo Solvent?

17 A No.

18 Q DeHert & Dougherty -- or Dougherty?

19 A That one sounds familiar.

20 Q Okay. Do you know anything else about it?

21 A No, no.

22 Q Glidden Company?

23 A Yes.

24 Q Do you know where they were located?

25 A No, I don't. I just -- I know that we hauled

1 from them quite a bit.

2 Q Do you know what you hauled for them?

3 A No, I don't.

4 Q Handschy Chemical?

5 A No.

6 Q Hooker Glass?

7 A No.

8 Q Bruce Horn?

9 A No.

10 Q Kerr Chemical?

11 A No.

12 Q Levy-Dunn?

13 A What is it?

14 Q Levy.

15 A Levy? Yeah.

16 Q Where were they located?

17 A Levy -- I think he's right here on the south side
18 of Chicago.

19 Q Do you recall what kind of waste they generated?

20 A I don't honestly remember. I thought it was an
21 ink, but I'm not sure.

22 Q Do you know if that waste went to both sites?

23 A No, I don't.

24 Q Luminous Ceiling?

25 A No.

- 1 Q Moffet Tech Center?
- 2 A No.
- 3 Q National Celofilm?
- 4 A Where's the address of that?
- 5 Q Don't have one.
- 6 A See, I just think I know the name. I just can't
- 7 place it.
- 8 Q Paisley Products?
- 9 A No.
- 10 Q PPG Industries?
- 11 A No.
- 12 Q Reliable Engineering?
- 13 A Sounds familiar, but I -- I couldn't swear to
- 14 that one.
- 15 Q Resins, Solvents & Varnishes? It was a facility
- 16 located in Chicago Heights.
- 17 A What's the name of it again?
- 18 Q Resins, Solvents & Varnishes.
- 19 A Wowie. I wouldn't-- we probably hauled them but,
- 20 you know, I don't recall that name.
- 21 Q Okay. Next company is Sinclair & Valentine.
- 22 A Sinclair, yeah.
- 23 Q Do you recall where they were located?
- 24 A No, I don't. I think the Heights.
- 25 Q Do you recall what kind of waste was picked up

1 there? No?

2 A No, no.

3 Q Okay. Do you recall which site it went to?

4 A If I'm not -- I don't know for sure on this **here**,
5 so I can't say what site. Everything come to the
6 yard, though.

7 Q Signoli Printing?

8 A No.

9 Q Stuart Chemical?

10 A No.

11 Q Western Electric?

12 A Yeah.

13 Q Do you recall where their facility or facilities
14 were?

15 A Well, I know the Western Electric Company. It
16 used to be on 22nd Street in Cicero.

17 Q Do you recall what kind of waste was picked up
18 there?

19 A No, no.

20 Q Young Spring & Wire?

21 A Young?

22 Q Young.

23 A Young? Was this in Blue Island?

24 Q I'm not sure.

25 A I can't find that one in Blue Island.

1 Q Is it correct, Mr. Klepser, that if I got some
2 addresses or locations for you, you could provide
3 further information regarding these companies?

4 A Yeah, but very few companies I could remember,
5 you know? The wire companies, I know where
6 they're at. But the names like Chicago Steel &
7 Wire is right here off 103rd. We hauled for a
8 few of them. I only know the one in Blue Island,
9 the one here.

10 Q Okay.

11 A Some of the other companies, it would have to be
12 a bulk load.

13 Q Next company, Mr. Klepser, is IPY or IPY Company?

14 A No.

15 Q Chicago Rotoprint Company?

16 A Yes, I think so.

17 Q Do you recall where they were?

18 A No, I don't.

19 Q Do you recall what kind of wastes they generated?

20 A Rotoprint would be ink.

21 Q Do you recall which site or sites it went to?

22 A No.

23 Q Chicago Sheepskin?

24 A I recall it and that's -- that was a nasty load.
25 Yeah, that come out of the stockyards, I believe.

1 Real nasty.

2 Q Okay. Do you know what was in it?

3 A Sheep piss. Stunk up the whole yard.

4 Q Chicago Steel & Wire?

5 A Yeah.

6 Q Do you know what they generated?

7 A Spun acid.

8 Q And would that waste go to both sites?

9 A I would say so, yes.

10 Q Were they a big account?

11 A If I'm not wrong, a couple loads a month which
12 you're hauling 5,000 gallons. You know, that's
13 good money. Should be a good load.

14 Q The next company is Fiberboard located at 34th
15 and Kedzie.

16 A Right, right. That's the one I was trying to
17 think of.

18 Q Okay.

19 A Right.

20 Q Do you recall what they generated?

21 A They had a problem in their sewers. What they
22 were doing when they made the fiberboard, what-
23 ever it was, it would go in the sewers and it was
24 a hazard in the sewers, so we come in and cleaned
25 it all up.

1 Q What kind of waste did they generate?

2 A I don't really recall. I just know it was a
3 nasty mess.

4 Q Would that go to both sites?

5 A That again, I couldn't swear to it.

6 Q Libby McNeill is next.

7 A Yeah, Libby. They're a company I forgot.

8 Q Where were they located?

9 A Libby was on -- right off of 57, Cal Park.

10 Q Calumet Park?

11 A Yeah. I think it's -- let's see, 127th. I
12 would venture to say 118th. I'm not sure. It
13 was either Blue Island or Cal Park, right at the
14 edge of it.

15 Q Do you know what kind of wastes they generated?

16 A That was nasty from tomatoes and garbage like
17 that. When they make -- process the food, we
18 would get their nasty waste. It was vegetables,
19 I guess you call it, the water.

20 Q Was there any oil or solvent waste?

21 A I would have to say yes, because you clean your
22 machines and -- you know.

23 Q Would that waste go to both sites?

24 A Well then, I'd have to say yes, but I'm not sure
25 because 9th Avenue started -- you know, we was

1 already doing business before 9th Avenue started,
2 so -- you know, 9th Avenue would only get a
3 portion of what we were taking there.

4 Q The next company is Martin Senour.

5 A No, not familiar.

6 Q Next company is National Precision Circuits.

7 A Yes.

8 Q What do you recall about them?

9 A I don't.

10 Q You just recall --

11 A I recall the names, right. We hauled from them.

12 Q Okay. The next company is Premiere Paint.

13 A I don't recall it.

14 Q Regal Tube?

15 A Yeah. It was oil and stuff.

16 Q Were they a tanker stop as well?

17 A I don't honestly know.

18 Q Do you recall where they were located?

19 A No.

20 Q Would that go to both sites again?

21 A Well, I'd have to say yes.

22 Q Interlake Steel?

23 A Yeah.

24 Q Where were they located?

25 A They're located in -- right off of Halsted. I

1 don't know if that's Riverdale.

2 Q Okay.

3 A I know we were there. I've done the job. I know
4 where it's at.

5 Q Do you know what kind of waste they generated?

6 A Well, they had a big oil spill. We cleaned that
7 up out of the canal and then we cleaned up behind
8 there, all their roller mills. But we dumped that
9 on the property, their property. We only hauled
10 the oil off. No. 6 oil.

11 Q Was that oil that you picked up taken to Scrap
12 and 9th Avenue?

13 A Yeah, I believe so.

14 Q Next company is Republic Steel.

15 A Yeah.

16 Q And where was --

17 A I think Republic Steel, we were hauling acid.
18 Among other things, I think it was an acid load
19 on that.

20 Q And where were they located?

21 A I don't -- now, Republic Steel, I know where the
22 plant is at now -- or used to be, and that's out
23 there by Burnham.

24 Q That's okay. Do you recall which specific one
25 was the customer?

1 A No, I don't.

2 Q Okay. Would that waste go to both sites again?

3 A I wouldn't -- I wouldn't really know that.

4 Q How about Hills-McCanna?

5 A It sounds familiar, but I can't recall it.

6 Q Inland Steel?

7 A I don't know on that one.

8 Q Jet Die Casting?

9 A No.

10 MR. KOWALSKI: Want to take a break?

11 (A recess was had.)

12 MR. KOWALSKI:

13 Q Okay. Mr. Klepser, continuing down on our list
14 here, you were telling me whether any of these
15 companies sounded familiar as customers of U.S.
16 Scrap or U.S. Drum. The next company is Motive
17 Industries.

18 A No.

19 Q Spot Nails?

20 A That sounds very familiar.

21 Q Do you recall anything about it?

22 A No. I think it was a drum load. I'm not sure.

23 Q How about Penn-Dixie Steel?

24 A That name I heard, yeah.

25 Q W. F. Hall?

1 A No.

2 Q Precision Twist Drill?

3 A Yeah.

4 Q Do you know anything more about them?

5 A No, I don't know what it was.

6 Q Midwest Wrecking?

7 A Midwest Wrecking would only be a one time load or
8 something. I don't recall that.

9 Q Okay.

10 A But that's what it would be.

11 Q Brandenburg Demolition?

12 A I don't recall that.

13 Q Benjamin Moore? It's a paint company.

14 A Yeah, that sounds familiar, very familiar.

15 Q Do you recall --

16 A I don't know if it was tankers or drum.

17 Q Dreeblan Paint?

18 A Very familiar, yes.

19 Q Were they a big account?

20 A Dreeblan Paint was a good account. Drums and bulk.

21 Q What kind of wastes?

22 A Paint, I would presume. Paint.

23 Q And would their wastes go to both sites?

24 A If we hauled it at that time, yes.

25 Q International Harvester?

1 A I seem to remember it, but I don't know.

2 Q Magee?

3 A No, I don't remember that.

4 Q Here's one you mentioned earlier, Rexene Polymers.

5 A Right. Bulk loads. All bulk loads.

6 Q Were they chemical loads?

7 A Water and milky water is what it was to me.

8 Plastics.

9 Q Where were they located again?

10 A They were located the other side of Joliet.

11 Q And did that waste go to both sites?

12 A Yes.

13 Q Illinois Tool Works?

14 A Don't recall it.

15 Q Brightly Galvanized?

16 A Yeah. If it was drums or bulk, I don't remember.

17 Q Do you recall what kind of wastes it was?

18 A No.

19 Q Do you know if it was an acid solution?

20 A I don't -- I couldn't tell you. I think it would
21 be.

22 Q Did that waste go to both sites?

23 A It would have to.

24 Q Next company is Continental Cleaning.

25 A No, I don't remember them.

1 Q Culligan?

2 A No.

3 Q Commercial Solvents?

4 A They sound familiar, but I couldn't swear to it.

5 Q Wyman-Gordon?

6 A Yes.

7 Q Do you know where they were located?

8 A Wyman-Gordon? Yeah, 147th and Ashland.

9 Q And what kind of wastes did they generate?

10 A They had a -- I would say water and oil because
11 they cut crankshafts.

12 Q Were they a pretty big account?

13 A They would go in spurts. At one time we may pick
14 up four loads that week. Other times we wouldn't
15 pick up a load for a month.

16 Q Would their wastes go to both sites?

17 A I couldn't honestly say that. I would -- assume
18 that, you know.

19 Q Next company is Boyle Midway.

20 A No.

21 Q Next company is McLean-Fogg.

22 A Yeah.

23 Q And you had mentioned them earlier.

24 A Right.

25 Q And where were they located?

- 1 A I'm not sure. I think it was Deerfield.
- 2 Q What kind of wastes did they generate?
- 3 A That was water and oil.
- 4 Q And did that go to both sites?
- 5 A I would think so.
- 6 Q The next company is R. A. Biggs.
- 7 A R. A. Biggs? I -- I don't remember the name.
- 8 Q How about Hendrickson Manufacturing?
- 9 A That sounds familiar.
- 10 Q Would it help --
- 11 A That's in LaGrange.
- 12 Q Would Lyons --
- 13 A Lyons, LaGrange -- Lyons, yeah.
- 14 Q Do you recall what they generated?
- 15 A No. I know we picked up.
- 16 Q Would their wastes go to both sites?
- 17 A I would have to think it would.
- 18 Q Okay. Venus Labs?
- 19 A I don't recall it.
- 20 Q Chrome Rite?
- 21 A No.
- 22 Q International Multi-Foods?
- 23 A No.
- 24 Q Sara Lee?
- 25 A Sara Lee, yes.

1 Q Okay. You told us about that earlier. Pittsburgh
2 Metals?
3 A No.
4 Q Clark Equipment?
5 A No, I don't recall it.
6 Q The next is a company that I have on my sheet.
7 It's Collis, C-o-l-l-i-s, which is listed --
8 A Collins.
9 Q Collins, and where were they?
10 A Iowa, I believe.
11 Q Do you recall what kind of wastes they generated?
12 A I know it was tankers. I don't know if it was
13 drum trailers. We did send drum trailers up
14 there, but I'm not sure about what -- you know.
15 I know about tankers.
16 Q Do you know what was in the tankers?
17 A No, I don't.
18 Q Do you know if that went to both sites?
19 A I -- honestly, I don't.
20 Q Next company is Leavitt Tube?
21 A Yeah. Picked up Leavitt Tube.
22 Q Where were they located?
23 A I think Leavitt Tube is in Blue Island.
24 Q And what kind of wastes did they generate?
25 A I don't know.

1 Q Do you recall where their wastes went?

2 A Our yard down there. You know, he can go any-
3 where. Storage trailers.

4 Q It also could have gone to the 9th Avenue site?

5 A Right. All of it could have gone down -- you
6 know -- what -- parts of it.

7 Q Alberto Culver?

8 A Yes.

9 Q Do you know what kind of wastes they generated?

10 A No.

11 Q Do you know where they were located?

12 A I think the north side.

13 Q Good Humor? Good Humor Company?

14 A I seem to have -- recalled loads, but I don't
15 remember for sure.

16 Q General Electric?

17 A I don't know.

18 Q Midwest Brass?

19 A No.

20 Q Here's a company in Blue Island, Mr. Klepser,
21 called Enterprise Wire.

22 A That's it, Enterprise. That's it.

23 Q Do you recall what kind of wastes they generated?

24 A Acid.

25 Q Did that go to both sites?

1 A I know it went to the Illinois site for sure.

2 Q And it may have also gone to the other site?

3 A You're right, because a lot of trucks were dispatched directly sometimes, you know, and we wouldn't even see them.

6 Q Next company is Specified Painting.

7 A I don't recall it.

8 Q Scott, Incorporated?

9 A On 95th Street?

10 Q I don't know.

11 A I don't know.

12 Q Stein, Hall --

13 A No.

14 Q (Continuing) -- in Bridgeview?

15 Chicago & Northwestern Railroad?

16 A Yes.

17 Q Okay, and what kind of wastes did they generate?

18 A I'm not a hundred percent sure. I know we hauled tankers. I don't know if we took drums or not.

20 Q Do you know what was in the tankers?

21 A Tankers would haul waste oil.

22 Q And do you recall the specific facility or facilities where you picked that up?

24 A No, no.

25 Q Would that waste go to both sites?

- 1 A Well, it definitely went to the one site that I
2 know of.
- 3 Q And that's to Scrap?
- 4 A Yeah, yeah. Okay, U.S. Scrap.
- 5 Q How about Electronic Plating?
- 6 A No.
- 7 Q Jones & Cleary?
- 8 A Jones & Cleary? No.
- 9 Q Lindbloom High School?
- 10 A No.
- 11 Q Midwest Recycling?
- 12 A No.
- 13 Q E. E. Staley?
- 14 A I seem to recall Staley.
- 15 Q Okay.
- 16 A What it was, I don't know. I just recall the name.
- 17 Q Texaco?
- 18 A Yeah.
- 19 Q Do you recall what they generated?
- 20 A No.
- 21 Q Do you recall the facility involved?
- 22 A No.
- 23 Q Thor Power?
- 24 A No.
- 25 Q Vandercook?

- 1 A No.
- 2 Q Amchem Products?
- 3 A No.
- 4 Q Armour Pharmaceutical?
- 5 A No.
- 6 Q Belden Corporation?
- 7 A No.
- 8 Q Bliss & Laughlin Steel Company?
- 9 A That's familiar.
- 10 Q Okay. Duo Fast Corporation?
- 11 A No.
- 12 Q EI Du Pont?
- 13 A Du Pont, yeah.
- 14 Q Okay. Do you recall where they were located?
- 15 A I think it was drums. Where they're located?
- 16 Q Yes.
- 17 A Oh, no. I think it's in the Heights, but I'm not
- 18 sure.
- 19 Q Do you know what kind of waste was in the drums?
- 20 A No, no.
- 21 Q Edmier, Incorporated?
- 22 A No.
- 23 Q Ethicon?
- 24 A No.
- 25 Q General Instrument Corporation?

- 1 A No.
- 2 Q Illinois Research Hospital?
- 3 A I'm not sure about that.
- 4 Q That might have been that waste you referred to
5 earlier?
- 6 A Right. I don't know where it came from.
- 7 Q Okay.
- 8 A We got a load a month. Three drums -- three to
9 four drums.
- 10 Q Inland Container Corporation?
- 11 A No.
- 12 Q John Deere Company?
- 13 A No.
- 14 Q Lawter Chemical Company?
- 15 A No.
- 16 Q Maybellene?
- 17 A Maybellene? It sounds familiar to me.
- 18 Q Do you know anything else about it?
- 19 A No. Just it stinks.
- 20 Q Merck Chemical Division?
- 21 A No.
- 22 Q Metropolitan Circuits?
- 23 A No.
- 24 Q Motorola, Inc.?
- 25 A I did a job for Motorola, but I don't recall what

1 it was.

2 Q Mr. Frank?

3 A Mr. Frank? They're a trucking company.

4 Q Do you recall hauling any waste for Mr. Frank?

5 A I -- no, not -- you know, I know we did, but I
6 can't specifically say we did.

7 Q Okay. Naz Dar Corporation?

8 A No.

9 Q Rexall Chemical?

10 A Yes.

11 Q Do you recall where that facility was?

12 A I think Rexall was a lot of bulk loads. Tankers.

13 Q Do you know what was in the tankers?

14 A No.

15 Q Do you know where that was located?

16 A No.

17 Q RIP Wrecking or Rest In Peace Wrecking?

18 A No -- yeah, RIP, RIP Wrecking.

19 Q RIP Wrecking?

20 A I know him.

21 Q Do you recall hauling for him?

22 A No.

23 Q Sherwin Williams?

24 A Yes, yes.

25 Q Okay. Do you recall what kind of wastes you

- 1 hauled for them?
- 2 A I know Sherwin Williams; and now that you brought
- 3 it up on that, I don't recall what it was.
- 4 Q Okay. Starr Trucking Company?
- 5 A No.
- 6 Q Stenograph Corporation?
- 7 A No.
- 8 Q Tee Pak, Incorporated?
- 9 A No.
- 10 Q Trilla Cooperage?
- 11 A Trilla Drum. I know we went there, but I don't
- 12 know what it was.
- 13 Q Where was that located?
- 14 A In Chicago. Trilla Drum used to be right off of
- 15 Ogden.
- 16 Q Okay. United Plating Division?
- 17 A No.
- 18 Q Universal Tools & Stamping?
- 19 A No.
- 20 Q Unocal?
- 21 A Unocal sounds very familiar.
- 22 Q Do you know anything else about it?
- 23 A I don't know if it was drums or bulk load.
- 24 Q Do you know where they're located?
- 25 A No.

1	Q	CARCO?
2	A	No.
3	Q	Turner Construction?
4	A	No.
5	Q	Hygrade Foods?
6	A	No.
7	Q	Hub Landfield?
8	A	What?
9	Q	Hub Landfield?
10	A	No.
11	Q	Western Union?
12	A	No.
13	Q	Mather-Selig?
14	A	No.
15	Q	General Mills?
16	A	No.
17	Q	St. Regis?
18	A	No.
19	Q	J. Passman & Sons?
20	A	No.
21	Q	Pioneer Wood Fabricators?
22	A	No.
23	Q	C & J Auto?
24	A	No.
25	Q	Lisner?

- 1 A No.
- 2 Q Berzell Iron & Metal?
- 3 A No.
- 4 Q City Wide Wrecking?
- 5 A No.
- 6 Q Public Iron Metal Company?
- 7 A No.
- 8 Q Sirroli Metal?
- 9 A No.
- 10 Q Alton Box Barrel?
- 11 A No.
- 12 Q Courtesy Lumber?
- 13 A No.
- 14 Q Western Felt Works?
- 15 A No, I don't think so.
- 16 Q Ace Scavenger?
- 17 A No.
- 18 Q Auburn Auto?
- 19 A No.
- 20 Q Marvel Metal?
- 21 A No.
- 22 Q Jewel Paint?
- 23 A No.
- 24 Q Northwest Salvage?
- 25 A No.

1 Q United Buckingham Freight?

2 A No.

3 Q United Wallpaper?

4 A No.

5 Q Container Corporation of America?

6 A No.

7 Q Okay.

8 A I'd like to have a list of all them companies,
9 though.

10 Q Enough of the companies, Mr. Klepser, to both our
11 relief. Let me ask you now to tell me,
12 generally, under what circumstances you went from
13 U.S. Scrap sites on the south side of Chicago
14 over to 9th Avenue in Gary.

15 A Well, I would go there to make roads, to clear
16 the property and to back-fill the property and,
17 generally, put things in the property.

18 Q You first went there in '73?

19 A I think that's when it was. I really -- now,
20 dates are no good for me anyway.

21 Q Okay. Did that become your principal place of
22 work after 1973?

23 A No, no. 9th Avenue was punishment.

24 Q Punishment for what?

25 A If you went there to work, there was nothing to

1 do. There was nobody around. Nothing to do.
2 It was punishment.

3 Q I see. How long were you at 9th Avenue?

4 A You might be there for a week. Then, you're **not**
5 there for a month. You might be there for three
6 days. You might be there for two days. No length
7 of time.

8 I think the longest time I ever worked
9 at that place was two to three weeks.

10 Q And that was operating the heavy equipment?

11 A Right, right.

12 Q Okay. Do you recall when waste was first taken,
13 to your knowledge, to the 9th Avenue site?

14 A Dates? I couldn't give you no date.

15 Q Could you give me a year?

16 A I would think '73, but I couldn't, you know,
17 swear to that. I don't know.

18 See, I may have started over there in --
19 with U. S. Drum in '70. I'm not sure until I
20 look and dig up something.

21 Q Uh huh.

22 A You know, because I never quit a job. I went
23 from one job to another job the same day. So I
24 mean I never lost an hour's worth of work --

25 Q Okay.

1 A (Continuing) -- you know.

2 Q During the time that you were at the 9th Avenue
3 site, was anyone else ever there with you?

4 A Well, you would have truck drivers in and out.
5 As far as working with me?

6 Q Yeah, or working on the site, whether it be with
7 you or on their own.

8 A There may have been a couple occasions, but, no.

9 Q Was there anyone who was stationed to the 9th
10 Avenue site --

11 A No.

12 Q (Continuing) -- for want of a better term?

13 A No.

14 Q Did that site have a specific operator?

15 A No.

16 Q Would the record keeping --

17 A No records.

18 Q No separate records were kept for 9th Avenue?

19 A No, no.

20 Q Would any of the U.S. Scrap or U.S. Drum records
21 show that loads were taken to the 9th Avenue site?

22 A I doubt it. I doubt it, because what would be the
23 reason?

24 Q When you were either a driver or dispatcher, did
25 you either direct any loads be taken to 9th Avenue

1 or did you ever take any yourself?

2 A Sure. I don't know too much about directing it.
3 I know I did take some. But -- trouble-shooter,
4 too. So if the truck broke down over there, we
5 lost a trailer there around a corner, and I had
6 to go raise it up and rehook it. So -- you know.

7 Q When you took your loads to the 9th Avenue site,
8 on the paper work you would be required to fill
9 out --

10 A What paper work?

11 Q As the driver picking up the loads, you would be
12 required to fill out paper work, right?

13 A You'd simply have a ticket for the company you're
14 picking up for. That's all the paper work you got.
15 You get --

16 Q Okay.

17 A You had the guy sign his name on the paper and
18 that's it.

19 Q As we discussed earlier, you would have a triple
20 copy trip ticket?

21 A Yeah.

22 Q And that would have --

23 A One or two or two or three -- I mean I'm not sure,
24 but I think it was like a triple.

25 Q That would have the company's name where you're

1 picking up?

2 A Right.

3 Q A description of what you're picking up?

4 A No.

5 Q No? It wouldn't say what you're picking up?

6 A No. If it was drums, it would say drums. If
7 you took Truck No. 9 and Tank No. 45, we would
8 know what that is.

9 Q Would it say amount of what you're picking up?

10 A Sure, amount of gallons, yeah; or drums, yeah.

11 Q And when you got to the company, you would then
12 give them one copy of that?

13 A Right.

14 Q Okay, and what would you do with the remaining
15 copies?

16 A Give them -- put them in the office.

17 Q You would never keep a copy yourself?

18 A No.

19 Q Okay, and you would never indicate and no one, to
20 your knowledge, would ever indicate where the
21 waste was taken on that ticket?

22 A No.

23 Q Other than those trip tickets, are you aware of
24 any other documentation kept?

25 A No documents. We didn't need any tickets or

1 anything like that.

2 Q Do you know if the information on the ticket was
3 transferred to any other kind of record keeping?

4 A Well, just like what you got. I know it would go
5 onto -- similar to that. You have to have a
6 record of what you're doing, so you could bill it.

7 Q Okay. The specific loads that you took to the
8 9th Avenue site yourself, do you recall where
9 those loads were picked up?

10 A Mine would come from the yard. I mean, you know,
11 if we had a load of Rexene, we would take it
12 there or else we'd dump it in the yard.

13 Myself, I would take -- they would run
14 all day and 90 percent would come into the yard
15 and we may run all night running it out of the
16 yard and still hauling loads and still pick up
17 customers.

18 Q So when you say "running it out of the yard," you
19 mean running --

20 A We would run it down to 9th Avenue or something
21 like that.

22 Q That would be to make room for more?

23 A Right.

24 Q Was the reason for that just to reduce the drive
25 over to 9th Avenue?

1 A Well, realistically, you have to say they would
2 come in the yard and have a flat -- or you could
3 use any terminology. The simplest thing was you
4 would only go to 9th Avenue, try not to be seen.
5 I mean that's no secret. That's what you would
6 probably do --

7 Q Okay.

8 A (Continuing) -- unless we had a prima donna
9 driver.

10 Q Most of the companies that we just went over,
11 their waste, if it was accepted after 9th Avenue
12 came into being, it would be taken to U.S. Scrap
13 as well as 9th Avenue, is that correct?

14 A Correct.

15 Q Was there any certain type of waste that was
16 never taken to 9th Avenue or any company's waste
17 that was never taken over there?

18 A Well, all your drum loads would be -- would be
19 processed through the drum operation.

20 Q At the U.S. Scrap --

21 A At U.S. Scrap, right, and they would not be
22 directly taken over there unless it was bad
23 drums.

24 Q But even in that event, the liquid from the drums
25 might be pumped out of the holding tank and taken

1 over to 9th Avenue?

2 A Right, right.

3 Q Okay. As part of your work over at 9th Avenue,
4 I take it you were involved in digging some of
5 the holes where the waste was buried?

6 A That's right.

7 Q Okay. Can you tell me, generally, where the
8 waste was buried at the 9th Avenue site?

9 A Well, in my time it was in the back.

10 Q Mr. Klepser, let me give you another drawing here
11 for the 9th Avenue site, and let me ask, first of
12 all, if that drawing would help you in describing
13 the site at all.

14 A See, this is all different when we came in.

15 Q Okay. As you're looking at the drawing, the road
16 on the bottom would be 9th Avenue and --

17 A Cline.

18 Q (Continuing) -- Cline would be on your right-hand
19 side?

20 A Right. See, it's too wide.

21 Q Okay. Let me just -- without marking this as an
22 exhibit then, let me ask you a couple of
23 questions. Was the entrance during the time that
24 you went to the 9th Avenue facility off of 9th
25 Avenue itself?

1 A Right.

2 Q And can you describe for me, to the best of your
3 knowledge, where the waste was dumped?

4 A Well, like what you got right in here -- all
5 right? From here, in that area there. (Indicating)

6 Q Okay. You're indicating --

7 A But, see --

8 Q Let me finish my question and we'll let you
9 continue. You're indicating that most of the
10 waste while you were at the site was dumped
11 toward the back --

12 A Right.

13 Q (Continuing) -- is that correct?

14 A Right.

15 Q And toward the back would be toward the south, is
16 that correct?

17 A Right.

18 Q Okay. Do you recall how many pits you dug at the
19 9th Avenue site?

20 A (No response)

21 Q No?

22 A No.

23 Q Okay. Were there ever any buildings or facilities
24 kept at the 9th Avenue site, to the best of your
25 knowledge?

1 A There was a small garage. It was there when we
2 got there, and there was a lot of scrap laying
3 around and no -- no other buildings, but a house
4 over here. (Indicating)

5 Q You're indicating to the east of the site?

6 A East of the site, there was a house, and I
7 believe them people owned that site.

8 Q Okay.

9 A But there was no other buildings.

10 Q During the times that you were at the site, did
11 anyone dump on the site other than Mr. Martell or
12 any of his companies?

13 A No. Of liquid, you mean? There was some black --
14 what do you call that stuff? Across the street
15 they got that.

16 Q Asphalt?

17 A Black Beauty. The people here had a little
18 truck and they kept dumping that. That's all.

19 Q Okay. Is that asphalt-like materials you're
20 talking about?

21 A No. It was a sandblasting material.

22 Q Okay.

23 A What do you mean by other people dumping on the
24 site? Of liquids, you mean?

25 Q Yes.

1 A Nobody else --

2 Q Okay.

3 A (Continuing) -- that I know of.

4 Q Okay. Were the companies whose liquid was
5 dumped at that site pretty much the same
6 companies we discussed earlier?

7 A Sure.

8 Q Do you recall any companies whose waste was
9 dumped at the 9th Avenue site that we did not
10 discuss in regards to the U.S. Scrap site?

11 A No.

12 Q Were there any specific locations where one kind
13 of waste would be dumped at that site as opposed
14 to another?

15 A Well, if you dumped acid in here and it was up
16 to the top, you wouldn't dump oil in it. Okay?
17 You'd have a reaction. So you would dump oil in
18 here, and the next day, if the acid was down, you
19 would put whatever else you had in there. But
20 you wouldn't put a thinner in here because acid
21 and, you know, certain things don't mix.

22 Q So the dumping would be done based upon the
23 conditions at a given time?

24 A Well, yes, and common knowledge.

25 Q Okay. What I'm asking is just as a general rule

1 of dumping there, would acids be kept or dumped
2 in one place and oils dumped in another, that
3 kind of thing?

4 A Just for one day.

5 Q Okay.

6 A I mean if you had a -- if you had a nice hole,
7 the only thing that would screw up a hole, if you
8 dumped paints and something and there was acid in
9 the hole, because the paint would curl up and
10 plug up your hole, so the hole would always be
11 full.

12 Q I might have already asked you this. Who else
13 worked at the 9th Avenue site that you know of
14 other than yourself?

15 A Frankie Churillo.

16 Q Frank Churillo. Did he work out there a lot?

17 A I was already gone.

18 Q He went out there after you left the company?

19 A Yeah. I never seen him out there. I heard he
20 was out there.

21 Q Okay.

22 A I mean there was other people working, but I
23 wouldn't have the knowledge of when or where or --
24 you know, 'cause you would come back and the
25 ground would be changed. There would be a new

1 hole.

2 Q Do you know how much waste was dumped out at the
3 9th Avenue site during the time you -- you were
4 there?

5 A No, I wouldn't even try to guess.

6 Q It would be safe to say a lot?

7 A Oh, I would think so.

8 Q Were there any tanks or storage containers at the
9 9th Avenue site?

10 A No.

11 Q Are you aware of a tanker truck ever being buried
12 at either the Scrap or 9th Avenue site?

13 A 9th Avenue? No. U.S. Scrap, possibly.

14 Buried? The whole tank, you mean?

15 Q Yes.

16 A Yeah. If we buried a tank, it was a holding tank.

17 Q I'm talking in terms of disposal as opposed to --

18 A Oh, no, no. I scrapped all them.

19 Q Where did you scrap them?

20 A I tore them all apart. They went -- on 87th
21 Street, Irwin Howell, I think. I tore them up
22 years ago.

23 Q Was it at the 9th Avenue site where you broke
24 your back?

25 A Yeah.

1 Q Okay. What happened in connection with that?

2 A Moving drums.

3 Q So you also unloaded drums at the 9th Avenue site?

4 A (Witness nodding head.)

5 Q Yes?

6 A Yes.

7 Q Okay. I thought you said earlier that all the
8 drums went to the Scrap site.

9 A Unless they were bad drums. See, you asked me a
10 specific question. I gave you an answer.

11 Q Okay. So the bad drums would go to the 9th
12 Avenue site?

13 A Not all of them. You know, near the end of my
14 time, they were, you know, going there.

15 Q And what would be done with the drums?

16 A We buried them.

17 Q You would bury them with the waste in them?

18 A Sure.

19 Q Okay. Mr. Klepser, you received a subpoena in
20 connection with your deposition today, right?

21 A Right.

22 Q Okay. That subpoena asked for you to bring any
23 documents you had relating to Mr. Martell or his
24 companies. Do you have any documents described
25 in that subpoena?

1 A That's the subpoena. (Indicating)

2 Q Other than the subpoena, do you have any other
3 documents?

4 A No.

5 Q Okay. I also discussed with you prior to your
6 deposition that you are entitled to witness fees
7 which are set forth by Statute in connection with
8 the deposition, and you mentioned that you wished
9 to waive any right to those witness fees, is that
10 correct?

11 A Right.

12 Q Okay. Final item of business, Mr. Klepser, is
13 I'm going to have the court reporter write up
14 your deposition in the form of a booklet which is
15 called a transcript, and it's going to look some-
16 thing like this. You have the right, when that's
17 typed up, to read through it for accuracy and
18 make any changes that you feel should be made and
19 sign your name to it, or you can waive the right
20 to read that and assume that the court reporter
21 took your testimony down accurately.

22 A Sure. I don't want to. I have no problem with
23 that.

24 Q Do you wish to waive?

25 A Yeah, right.

1 MR. KOWALSKI: Very good, sir.

2 FURTHER DEPONENT SAITH NOT.

3 * * * * *

4 C E R T I F I C A T E

5 I, Richard L. Fissinger, CSR and Notary
6 Public in and for the County of Lake, State of Indiana,
7 do hereby certify that there appeared before me the
8 deponent, EARL JACK KLEPSEK, at Room 307, 507 State
9 Street, Hammond, Indiana, on the 23rd day of March,
10 1938, who was thereupon first duly sworn by me to
11 testify the truth and nothing but the truth in
12 response to questions propounded to said deponent at
13 the taking of the foregoing deposition relating to the
14 above-captioned cause now pending and undetermined in
15 said court.

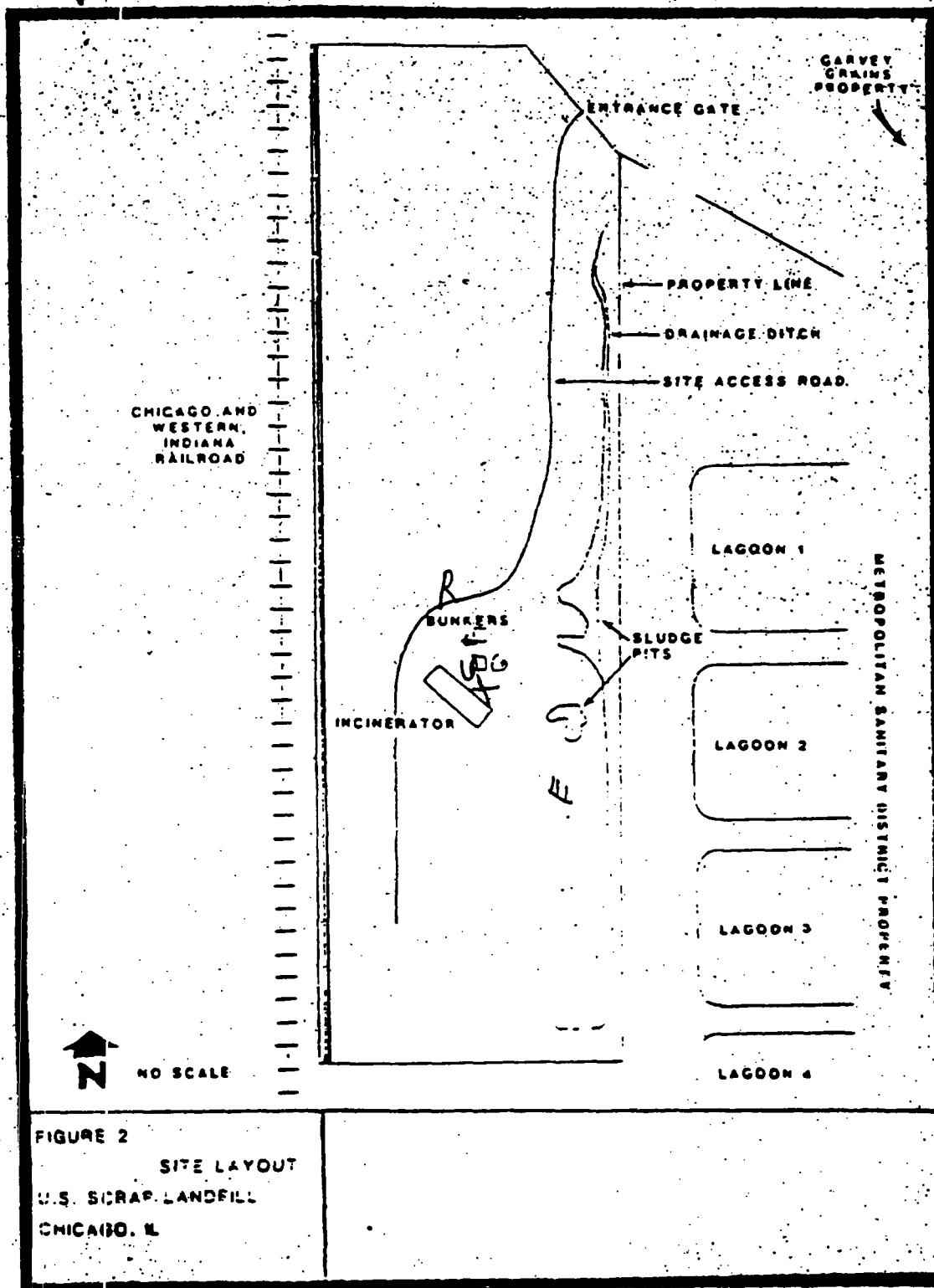
16 I further certify that I then and there
17 reported in machine shorthand the testimony so given
18 at said time and place, and that the testimony was
19 then reduced to typewriting from my original shorthand
20 notes, and the foregoing typewritten transcript is a
21 true and accurate record of said testimony given by
22 said deponent at said time and place.

23 I further certify that I am not related by
24 blood or marriage to any of the parties to said suit,
25 nor am I an employee of any of the parties or of their
attorneys or agents, nor am I interested in any way,
financially or otherwise, in the outcome of said
litigation.

19 I further certify that the reading and
20 signing of the foregoing deposition was waived by the
21 parties on the record.

22 Dated at Hammond, Indiana, this 5th day of
23 April, 1938.

24 
25 Richard L. Fissinger



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Other:

1 A No.

2 Q Other than the other employees we've mentioned here
3 today, do you recall the names of any other truck
4 drivers with whom you worked?

5 A No.

6 MR. KOWALSKI: Okay. Those are all the
7 questions I have, Mr. Mac Farlane.

8 You have the right to read over your
9 transcript when we have it printed up and
10 correct any errors you may find and sign off
11 on it, or you may do what's called waive
12 signature, where you trust that everything
13 will be taken down accurately and you waive
14 the right to read it.

15 Which option do you care to exercise?

16 THE WITNESS: I would prefer to inspect
17 it before I sign it.

18 MR. KOWALSKI: Very good. Signature is
19 reserved.

20 (Which concluded the taking of the
21 deposition of RONALD MAC FARLANE.)

22
23 _____
24 RONALD MAC FARLANE

25 Subscribed and sworn to
before me this _____ day
of _____ 1988.

NOTARY PUBLIC
My commission expires:

C E R T I F I C A T E

I, MARY ANN OWCZAREK, being a qualified and competent shorthand court reporter, and being first duly authorized to administer said oath, do hereby certify there appeared before me RONALD MAC FARLANE, deponent herein, on the 1st day of September, 1988, at 507 State Street, Hammond, Indiana, who was thereupon duly sworn by me to testify the truth and nothing but the truth in response to questions propounded to said deponent relating to the above-captioned cause now pending and undetermined in the said court.

I further certify that I then and there reported in shorthand the testimony so given at said time and place, and the testimony was thereafter reduced to typewriting from my original shorthand notes, and the foregoing transcript is a true and accurate record of said testimony given by said deponent.

I further certify that I am not related by blood or marriage to any of the parties to said suit, nor am I an employee of any of the parties or of their attorneys or agents, nor am I interested in any way, financially or otherwise, in the outcome of said litigation.

I further certify that after said deposition had been so transcribed, it was read over by the said witness and signed by him.

Dated at Hammond, Indiana, on the _____ day of _____, 1988.

Court Reporter

A P P E A R A N C E S:

MR. EDWARD KOWALSKI and
MR. MARK THOMAS,
111 West Jackson Boulevard,
Chicago, Illinois 60602,

appeared on behalf of the United States
Environmental Protection Agency.

--000--

MR. KOWALSKI: For the record, this
will be the deposition of Mr. Ronald Mac
Farlane, taken pursuant to a subpoena issued
under the authority of the Superfund Amend-
ments and the Reauthorization Act.

RONALD MAC FARLANE,

having been first duly sworn, was examined and
testified as follows:

EXAMINATION
BY MR. KOWALSKI:

Q Mr. Mac Farlane, I'm going to be asking you some
questions in connection with the United States
Environmental Protection Agency's investiga-
tion into two dumping sites on the south side of
Chicago and Gary, Indiana. The first one I'll
term "U. S. Scrap," and that's located at approx-
imately 122nd Street and Cottage Grove in Chicago,
and the other site I will refer to as the 9th

1 Avenue dump site, and that is located at approxi-
2 mately 9th and Cline Avenues in Gary, Indiana.

3 If you don't understand any of my ques-
4 tions, let me know; I will be happy to repeat them
5 or rephrase them.

6 If you have any questions for me, stop
7 me and I'll be happy to clarify for you.

8 Mr. Mac Farlane, can you tell me how old
9 you are, sir?

10 A Forty-one.

11 Q And your current address?

12 A 10827 Schneider.

13 Q And where is that located?

14 A Cedar Lake, Indiana.

15 Q And you live there with your wife or family?

16 A Yes.

17 Q And do you have any plans on moving in the near
18 future?

19 A No.

20 Q Are you currently employed?

21 A Yes.

22 Q And where is that?

23 A Environmental Cleanup Contractor Service.

24 Q And where is that located?

25 A 640 South Wheeler; Griffith, Indiana.

1 Q And what is your position with them?

2 A Vice President.

3 Q And how long have you been with Environmental
4 Cleanup?

5 A Approximately two years.

6 Q Okay, and prior to that, where were you employed?

7 A Mid America Environment Service.

8 Q And where are they located?

9 A Well, I don't know if you want to write all this
10 down. Mid-America--there's a long story involved;
11 when Mid-America was bought, the name was held, but
12 then the name was changed to Maecorp, and Mid-
13 America Environment Service I presume was dis-
14 solved. In theory, they were both the same company.

15 Q Okay.

16 A They were split for legal reasons.

17 Q I see.

18 A And the one was dissolved, so Mid-America Environ-
19 ment Service for all practical purposes will also
20 be Maecorp for this deposition.

21 Q All right. How long were you employed by Mid-
22 America?

23 A Approximately fifteen years.

24 Q And did you work out of a specific address during
25 that time period?

A Two addresses; one was in Riverdale, Illinois, and

1 at the end of my employment, I was in Homewood,
2 Illinois.

3 Q Is that company still in existence in any form?

4 A Maecorp is in existence.

5 Q Okay, and what was your position with Mid-America
6 before Maecorp?

7 A I was a driver for probably eight of the fifteen
8 years, and then I was Operations Manager for the
9 Field Division after that.

10 Q What kind of business is Mid-America, Maecorp?

11 A They were a hazardous waste transporter; then they
12 got into the remediation for hazardous waste clean-
13 ups.

14 That's when they split the company at one
15 time to the transportation field; then the end
16 result was, the transportation was dissolved.

17 Q Okay, and prior to Mid-America where were you
18 employed?

19 A U. S. Scrap.

20 Q Okay.

21 A And there were several names.

22 Q And we'll go into that.

23 A It's up to you.

24 Q Okay. Do you recall when you first went to work
25 for U. S. Scrap?

1 A I believe it was early 1970.

2 Q Okay. How did you happen to become employed there?

3 A I was driving at the time, and they were hiring
4 drivers, and I went over there and applied.

5 Q And how long did you work for U. S. Scrap?

6 A Approximately two years.

7 Q And what were your job duties at U. S. Scrap?

8 A I was a driver.

9 Q Did you work out of any specific facility?

10 A Yes; 122nd and Cottage Grove.

11 Q Okay, and what were your job duties as driver?

12 A To pick up loads at designated facilities and
13 deliver them to one of the few sites.

14 Q Was one of those sites the site at 122nd and
15 Cottage Grove?

16 A Yes.

17 Q And was another of those sites 9th Avenue and Cline
18 in Gary, Indiana?

19 A Yes.

20 Q Were there any other sites?

21 A Yes, there were. I believe there was a site in
22 Ottawa, Illinois.

23 Q Would you deliver loads to the 122nd and Cottage
24 Grove facility the entire time you were a truck
25 driver at U. S. Scrap?

1 A That was one of them, yes.

2 Q And did the 9th and Cline site operate as a
3 recipient of this waste during your entire time at
4 U. S. Scrap?

5 A Toward the end of my employment.

6 Q Okay. Can you tell me approximately when you
7 started started transporting the waste to the 9th
8 and Cline site?

9 A No, I couldn't.

10 Q Okay. Was there any distinction made as to what
11 kinds of waste would go to the U. S. Scrap site and
12 which kinds of waste would go to the 9th and Cline
13 site when both were operating?

14 A To the best of my recollection, more drums went to
15 the 9th Avenue than liquid.

16 Q When you said more drums than liquid, you mean that
17 if the load consisted of waste contained in drums
18 versus waste contained in a large tanker, it would
19 more likely go to 9th?

20 A Yes.

21 Q As a driver, when you were requested to make a
22 pickup of waste at one of the generating facilities,
23 who would give you that task or assignment?

24 A Whoever was dispatching.

25 Q Okay, and Bob Baich was the dispatcher sometimes,

- 1 correct?
- 2 A Correct.
- 3 Q And Bob Thompson was the dispatcher sometimes?
- 4 A Correct.
- 5 Q Okay. Did Lynn Tyree operate as a dispatcher some-
- 6 times?
- 7 A Yes.
- 8 Q Is there anyone else who acted as dispatcher during
- 9 the time you worked out there?
- 10 A Sometimes Earl Klepsur would fill in.
- 11 Q Anyone else you recall?
- 12 A No.
- 13 Q When you were assigned a pickup at one of the
- 14 facilities, were you given some paper work in
- 15 connection with your hauling activities?
- 16 A Yes.
- 17 Q And that would be an invoice or trip ticket of some
- 18 kind?
- 19 A Yes.
- 20 Q And were there several copies to that document?
- 21 A I believe there was two copies.
- 22 Q Would that ticket be filled out when it was given
- 23 to you, somewhat?
- 24 A Yes.
- 25 Q And that would be filled out by the dispatcher?

1 A Yes.

2 Q And what kind of information would they put on it?

3 A The customer's name and address and normally, a trailer
4 was assigned for each pickup.

5 Q Given one of the trailers that was used by the
6 U. S. Scrap Corporation was specifically assigned
7 for the pickup?

8 A Yes.

9 Q Was that identified by a trailer number or name?

10 A Yes, a number.

11 Q During the time you worked at U. S. Scrap, how many
12 different trailers did they have?

13 A Somewhere between 40 and 60, I would assume.

14 Q Did they consist of both flatbed as well as tanker
15 style trailers?

16 A Yes.

17 Q I presume these were pulled by a tractor cab of
18 some kind?

19 A Yes.

20 Q For many of these were in operating while you were
21 at Scrap?

22 A At any one time, I would say to the best of my
23 recollection, it would be somewhere around eight
24 to ten power units.

25 Q Did any of these cabs or trailers have company or

corporate names or identifications on them?

A Yes.

Q Okay, and that was that name or those names that were used?

A "M. S. Scrap" and "Liquid Engineering."

Q Do you recall "M. S. Scrap" being used on any of those?

A I could recall it being on a truck but the name doesn't sound right.

Q How about "Liquid Engineering"?

A Yes.

Q So the two names you recall on the trucks or trailers were "M. S. Scrap" and "Liquid Engineering"?
A Yes.

Q Now, invoices or the bill tickets that were used by the company, do those have a company name on them?

A Yes.

Q And which name or names were those?

A I believe it was just M. S. Scrap.

Q Now there are instructions given as to when a U. S. Scrap vehicle would be used for a pickup, as opposed to a Liquid Engineering vehicle?

A Yes. The Liquid Engineering, to the best of my recollection was more into small units which were more industrial-cleaning type equipment, but were

1 also just by leaving it as that.

2 Q Would they also be used for waste pickup from a
3 holding tank of some kind of facility?

4 A The vacuall units would normally be used on site to
5 pick up material. Then a semi unit or power unit
6 and trailer would come and pump the load out of
7 that unit, because that unit couldn't pull a load
8 on the road.

9 Q Can any waste ever taken to U. S. Scrap and held
10 in some kind of storage tank either in a truck
11 which is underground or above ground; then pumped
12 out and taken to Cth Avenue?

13 I don't remember.

14 Q All the tickets that are prepared by the dis-
15 patcher have the waste type indicated on it when
16 the driver would receive it?

17 A I don't think so.

18 Q Okay. The driver would take the trip ticket with
19 him when he went to pick up a load at the facility,
20 correct?

21 A Right.

22 Q And when he picked up a load, would that then be
23 signed by someone at the facility?

24 A Yes.

25 Q Okay, and would the person at the facility then be

1 provided with a copy of it?

2 A Yes.

3 Q And then the driver would take the other copy back
4 to U. S. Scrap with him?

5 A Yes.

6 Q And that would then be turned into the dispatcher?

7 A Yes.

8 Q And those my understanding is, were collected at
9 the office trailer on site and later taken to the
10 main office on Kensington at the end of the week or
11 whatever, is that correct?

12 A I turned them in to the dispatcher when I came back
13 to the yard.

14 Q And you don't know what was done with them after
15 that?

16 A No.

17 Q You were never involved with transferring them from
18 122nd and Cottage Grove to East Kensington, were
19 you?

20 A No.

21 Q During the time that you were a truck driver, Mr.
22 Mac Farlen, did you transport waste to both the
23 122nd and Cottage Grove facility and the 9th
24 Avenue facility?

25 A Yes.

1 Q Most of the companies that you picked up waste
2 from, would the waste go to one site versus the
3 other, or to both sites?

4 A It could go to either one.

5 Q Okay. I would like to go into the specific com-
6 panies that you can recall where you picked up waste
7 and transported it either to U. S. Scrap or 9th
8 Avenue. Do you recall any of those companies?

9 A Yes, some.

10 Q Okay. Can you name one for me?

11 A E. R. Donnelley.

12 Q And do you recall where that specific facility or
13 facilities were located?

14 A One was in downtown Chicago and one was in Mattoon,
15 Illinois.

16 Q Do you recall what kind of waste you picked up from
17 E. R. Donnelley?

18 A I believe it was always drums.

19 Q Do you recall what was in the drums?

20 A I assume it was ink waste.

21 Q Do you have anything on which you base that
22 assumption, other than their kind of business?

23 A Just the assumption; they were in the business of
24 dealing with ink.

25 Q Okay, and was E. R. Donnelley a large customer or

1 small customer or mid-sized customer?

2 A mid to large.

3 Q Do you recall the size of the load you would pick
4 up from R. B. Connelley or the frequency of the
5 load?

6 A The size of the load was whatever would fit on the
7 trailer. That was determined by how long it was.

8 Q And how about the frequency with which you picked
9 up at R. B. Connelley?

10 A Yes.

11 How often would you know?

12 A It would be once, once a week to say, five
13 times a week.

14 Q As a driver, would you have regular stops that you
15 would go to, or as opposed to other drivers who
16 had other designated stops, or was it random choice?
17 Was it by way of random; some were specific.

18 Q What was the logic behind the specific sites?

19 A One place in particular was always picked up on a
20 weekend, and at the end of my employment, I had
21 enough seniority to choose some loads.

22 Being a teamster, I chose to work the
23 weekend for the time and a half, and I usually
24 picked up a load in Clinton, Iowa that was always
25 on a weekend.

1 Q Was that Kolia in Clinton, Iowa?

2 A Sounds familiar, but I remember Clinton, Iowa.

3 Q Okay. Were all the drivers there teamsters?

4 A Yes.

5 Q Is that Local 3715?

6 A We went through two locals; I think there was 731,
7 and then we got transferred to 705, I think.

8 Q How often would you haul for Donnelley?

9 A Approximately once a month.

10 Q Do you recall taking their waste to both the
11 W. S. Scrap site and the 9th Avenue site during
12 your driving activity?

13 A I can't remember.

14 Q Okay. Your estimates on the number of pickups
15 that you were not personally involved in are based
16 upon your discussions with other drivers?

17 A Partially.

18 Q Anything else that you used to base your estimates?

19 A I used to see all the tickets when I was in the
20 office, and sometimes I would pick and choose the
21 better of the loads, so I would see what
22 was on the schedule for that day.

23 MR. KOWALSKI: Okay.

24 (After a brief recess.)

25 MR. KOWALSKI: Back on the record.

1 Q Mr. Mac Farlane, do you recall the name or names of
2 any individuals with whom you would deal at R. R.
3 Donnelley?

4 A I can't recall that far back.

5 Q Okay. What other companies do you recall picking
6 up waste from?

7 A As I mentioned earlier, the one in Clinton, Iowa.

8 Q And you don't recall the specific name of that
9 company?

10 A No.

11 Q Do you recall what kinds of wastes you picked up
12 there?

13 A I believe it was corrosive-type waste.

14 Q Do you recall anything about that company's
15 facility that could be used to identify it, street
16 name or part of town or general description of the
17 premises?

18 A To the best of my recollection, it was on the
19 west side of town, just north of the main thorough-
20 fare through Clinton.

21 Q And do you recall the size of load or frequency of
22 loads you would pick up from Clinton, Iowa?

23 A The size was normally a 5,000 gallon vacuum tanker.
24 The frequency I think was approximately three
25 times a month--two to three; rephrase that.

1 Q Okay. Do you recall if that waste went to 9th
2 Avenue, U. S. Scrap, or both?

3 A It's hard to decipher a specific generator where
4 their material went.

5 Q And the reason is that given conditions and the
6 like, a specific generator's wastes might have gone
7 to either site?

8 A Yes. Normally I would bring a load into the yard
9 and drop it. Normally I would not deliver the load
10 I brought in, and when I did, I could not say one
11 generator's wastes went to 9th Avenue or whether
12 his waste went to 122nd, because normally, we would
13 just drop trailers in the yard.

14 They would be delivered at a later time
15 whenever a driver had time, he might come in the
16 yard, pick up someone else's load and deliver it,
17 not knowing whose--who picked this load up and what
18 it is.

19 Q Do you recall the names of any individuals with
20 whom you dealt at that Clinton, Iowa facility?

21 A No.

22 Q What other companies do you recall hauling for?

23 A Triumph Twist and Drill.

24 Q Do you recall where they were located?

25 A Rhinelander, Wisconsin.

1 Q Do you recall what kind of waste you picked up from
2 them?

3 A I believe it was also a corrosive, also.

4 Q And do you recall the size of the load or frequency
5 of load?

6 A The size was approximately 3,000 to 4,000 gallon
7 tanker that was spotted at the facility, and we
8 would bring an empty trailer up and drop the empty;
9 bring the load back.

10 The frequency I would say approximately
11 two, three times a year.

12 Q And do you recall the names of any individual you
13 dealt with at the Triumph Twist and Drill facility?

14 A No.

15 Q Okay. What's the next company you recall hauling
16 for?

17 A I believe it was Chicago and Northwest Railroad.

18 Q Do you recall where that facility was located?

19 A Northwest side of Chicago; I think it was Northlake,
20 right in there.

21 Q Do you recall the nature of the waste?

22 A Yes, it was an oily waste from their treatment
23 facility.

24 Q Do you recall the frequency or size of loads?

25 A They were 5,000 gallon vacuum tanks again

1 they were a mid to large customer.

2 Q And do you recall the name of any individual with
3 whom you dealt out there?

4 A No.

5 Q Okay. What's the next company you recall?

6 A Sun Chemical, which was also in Northlake, I believe.

7 Q Did Sun Chemical have more than one facility where
8 you'd pick up?

9 A This is one of those times; I don't want to confuse
10 generators. I knew of other Sun Chemical facili-
11 ties but I can only recall picking up at the North-
12 lake facility.

13 Q Okay. Do you recall the kind of wastes you picked
14 up there?

15 A It was either ink or paint.

16 Q Do you recall the size of load or frequency of
17 load?

18 A They had both drum loads and vacuum loads for
19 liquid. Frequency, as best I can recall, once a
20 month.

21 Q Where would you place them on the spectrum of large
22 to small customers?

23 A Small.

24 Q And do you recall the names of any individuals with
25 whom you dealt out there?

1 A No.

2 Q Is it fair to assume unless you tell me otherwise
3 that these companies' loads could have gone to either
4 9th Avenue or U. S. Scrap?

5 A Yes.

6 Q Okay; what's the next company you recall?

7 A Enterprise Steel and Wire in Blue Island.

8 Q And what kind of waste did you haul for them?

9 A Corrosive.

10 Q And do you recall the size or frequency of load?

11 A The size was always a 5,000 gallon tanker. To make
12 it easier, it would be a mid to large, in comparison
13 with others: we are using small, medium and large.

14 Q Uh, but as it would be a mid to large account?

15 A Yes.

16 Q Do you recall the names of any individuals with
17 whom you dealt out there?

18 A No.

19 Q Okay. What's the next company you recall?

20 A Clark Oil in Blue Island.

21 Q And what kind of wastes did they have?

22 A Normally an oily and/or sludge material.

23 Q And do you recall the size or frequency of load?

24 A Size would be a 5,000 gallon, and I would say they
25 were a mid-sized customer.

1 Q And do you recall the names of any individuals
2 at that facility?

3 A No.

4 Q Okay. What's the next company you recall?

5 A DeSoto Chemical in Chicago Heights.

6 Q And what kind of waste did they have?

7 A I believe it was just drummed waste.

8 Q And you don't know what was in the drums?

9 A No.

10 Q Do you recall the size or frequency of the load?

11 A I would say small to medium, if it's fair to keep
12 using that comparison, rather than getting into--

13 Q If you recall specific frequency or amounts, that
14 would be preferable.

15 A Okay.

16 Q But if all you can do is--

17 A Some customers I could.

18 Q Okay.

19 A The majority, I really can't.

20 Q Okay; that's fine. The more specific information
21 you can give, the better, and do you recall the
22 names of any individuals with whom you dealt at
23 De Soto?

24 A No.

25 Q Okay. What's the next company you can recall?

1 A I can't remember their name but there was two
2 customers in Lake Zurich or around Lake Beach. I
3 can remember the town but I cannot remember the
4 customer.

5 Q If I gave you a name, do you think this would
6 refresh your recollection?

7 A Yes.

8 Q Illinois Bronze Coatings?

9 A It sounds familiar.

10 Q Do you remember a street in Lake Zurich?

11 A All I can remember, it was right on or right just
12 off a main drag through Lake Zurich.

13 Q Could it have been on a street called Main Street?

14 A Possibly.

15 Q And what can you tell me about the waste type you
16 picked up in Lake Zurich?

17 A The only thing I can remember is, the majority
18 was a vacuum tanker.

19 Q Do you recall picking up at another facility in
20 Lake Zurich called R. A. Briggs?

21 A The name again sounds familiar.

22 Q Does Church Street refresh your recollection at all?

23 A No.

24 Q Okay. The facility on or around Main Street you
25 recall it being a vacuum tanker; do you recall what

1 the nature of the waste was there?

2 A No.

3 Q Do you recall anything about the size of the load
4 or the frequency of the load?

5 A They would be classified as a small customer.

6 Q I know it's difficult, asking you off the top of
7 your head to come up with names as you recall them.
8 Maybe another way to do this would be to ask you
9 about certain geographic areas or try to recall
10 who the largest customers were, whatever is easiest
11 for you.

12 A I was going by geographic area.

13 Q Okay.

14 A In a sense. That's how I started up north and
15 worked my way around. It's just very hard to
16 remember the customers' names unless they are
17 publicized in the paper lately or something of
18 that nature where it refreshes my memory.

19 Q Okay. I'm going to ask you to try and remember
20 as best you can. Now when we've exhausted that,
21 I'll give you some names and ask if they refresh
22 your recollection, and that may make it a little
23 easier.

24 But I would rather you recall them to
25 the extent you can first. What's the next company

1 you recall?

2 A It's hard to come up with names of customers going
3 back sixteen years.

4 Q Do you recall picking up waste from A. E. Staley?

5 A I don't recall that.

6 Q Okay. Do you recall any other out-of-state pick-
7 ups that you made, other than the one in Clinton,
8 Iowa and the one in Rhinelander, Wisconsin that
9 you mentioned?

10 A No.

11 Q Okay. Do you recall any pickups in Indiana?

12 A I don't recall any, but I remember picking up from
13 generators in Indiana.

14 Q Okay; do you recall which towns in Indiana?

15 A No.

16 Q Do you recall picking up loads at Abbott Laborator-
17 ies?

18 A No.

19 Q Do you recall picking up from a company called
20 Active Services Company?

21 A Active?

22 Q Active, A-c-t-i-v-e.

23 A No.

24 Q How about a company called Adolph Plating?

25 A The name sounds familiar.

- 1 Q Do you recall anything about it?
- 2 A No.
- 3 Q Do you recall picking up any loads at Alberto-
- 4 Oliver?
- 5 A Yes, the name does sound familiar, but I can't
- 6 recall the actual facility.
- 7 Q Would it refresh your recollection if I said it
- 8 was in Melrose Park on Armitage Avenue?
- 9 A Yes, I was there.
- 10 Q Do you recall what kind of waste you picked up
- 11 there?
- 12 A It would be liquid with a vacuum tanker.
- 13 Q Do you recall what kind of liquid?
- 14 A Probably classified as aqueous waste or a water
- 15 waste.
- 16 Q And that would be water mixed with some kind of
- 17 chemicals?
- 18 A Correct.
- 19 Q That would be the result of a cleaning process?
- 20 A Possibly.
- 21 Q And do you know the size of that account, the size
- 22 or frequency of load?
- 23 A I would say he was a small to very small.
- 24 Q How about a company called Alton Boxboard Company?
- 25 A No.

1 Q Do you recall picking up for a company called
2 American Can Company?

3 A Yes.

4 Q Do you have in mind that one facility was involved?

5 A The one that comes to mind is on 55th and Western
6 as Daken, and that is the only one that I could
7 recall.

8 Q And do you recall the nature of the waste?

9 A Iron waste.

10 Q Do you know what was in the drums?

11 A Yes.

12 Q When? Do you recall the size or frequency of load?

13 A The size was 20 to 40 drums. The reason for that
14 was, we couldn't get a longer trailer in there.
15 We used a shorter trailer because of the dock area
16 had very limited access.

17 Q Where would you place them in terms of size of
18 customers?

19 A I would say small.

20 Q I can speed things up here, Mr. Mac Farlane, by
21 not constantly asking you if you recall the names
22 of any individuals with whom you dealt.

23 Can we make that a standing question
24 for all these questions?

25 A Yes.

1 Q And if someone comes to mini, you'll volunteer
2 that?

3 A Yes.

4 Q Okay.

5 A A customer just came into my mind; I believe it was
6 Chicago Steel and Wire on 103rd and Torrence.

7 Q And do you recall the kind of waste they had?

8 A Corrosive.

9 Q Okay. Do you recall the size or frequency of loads?

10 A It was 5,000 gallon vacuum loads, and I would
11 classify them as a mid to large account.

12 Q Do you recall picking up any loads at American Motor
13 Club in Kenosha, Wisconsin?

14 A Can we go off the record one second?

15 MP. KOWALSKI: Sure.

16 (Discussion off the record.)

17 THE WITNESS:

18 A I don't recall picking up that material for U. S.
19 Scrap.

20 MP. KOWALSKI: Okay.

21 Q Do you recall picking up any waste from a company
22 called American Printers?

23 A No.

24 Q Do you recall while you worked at U. S. Scrap
25 picking up any waste from a company called Apeco?

1 A No.

2 Q Do you recall picking up any waste from Armour
3 Company, or Wilson?

4 A No.

5 Q Do you recall picking up any waste at a company
6 called Armstrong Paint or Elliott Paint Company,
7 P-a-i-n-t Company?

8 A The name is familiar, but I don't recall the
9 facility.

10 Q Would it refresh your recollection if I said a
11 facility located at 123rd and Kilbourn in Chicago?

12 A No.

13 Q Do you recall hauling any waste from a company
14 called Ashland Chemical Company?

15 A I can recall the name Ashland Chemical, but not
16 whether it was picked up for U. S. Scrap.

17 Q Do you recall hauling any waste for a company
18 called Barber-Green located in Aurora?

19 A No.

20 Q How about a company called Bagcraft?

21 A No.

22 Q Do you recall hauling for a company called Barker
23 Chemical?

24 A Again, I recall the facility or name of the
25 facility but I don't know whether it was hauled

1 for U. S. Scrap.

2 Q Okay. Do you recall hauling for a company called
3 Barrett Varnish Company while you were at U. S.
4 Scrap?

5 A No.

6 Q Do you recall hauling for a company called
7 Benjamin Moore Company?

8 A The name is familiar.

9 Q Would it refresh your recollection if I said the
10 facility was at North and 25th Avenues in Melrose
11 Park?

12 A Yes.

13 Q Do you recall what kind of waste you hauled for
14 them?

15 A Paint waste.

16 Q And do you recall anything about size or frequency
17 of load?

18 A The size, I don't remember; the frequency I would
19 say was small.

20 Q Do you recall picking up from a company called
21 Big Ben Chemicals?

22 A No.

23 Q How about a company called Blaw-Knox Foundry?

24 A No.

25 Q Do you recall picking up from a company called

1 Boyle-Midway?

2 A No.

3 Q Do you recall picking up from a company called
4 Brett Ford Manufacturing in Schiller Park?

5 A No.

6 Q Do you recall picking up from a company called
7 Brightly Galvanized?

8 A Yes.

9 Q do you recall where they were located?

10 A I believe it was in Cicero, approximately 25th to
11 30th Street.

12 Q And do you recall the nature of the waste?

13 A Corrosive.

14 Q And do you recall anything regarding size of load
15 or frequency of load?

16 A Size was a 5,000 gallon vacuum; frequency would be
17 small to mid.

18 Q Do you recall picking up at a company called
19 Boltmaster?

20 A No, but I recall a bolt company in Rock Falls,
21 Illinois or Sterling that made bolts.

22 Q Okay. What kind of waste did you pick up from
23 them?

24 A A sludgy-type material.

25 Q And do you recall anything regarding size or

1 frequency when you went there?

2 A The size was a 5,000 gallon vacuum. Frequency,
3 once to twice a month. That was one of those runs
4 that I normally took.

5 I remember one person from that facility.
6 It was a Butch Musgrave who was employed by that
7 company; I believe it was R B & W or something like
8 that. He was the gentleman I seen to pick up the
9 load.

10 Q Okay. Going back to this company called Boltmaster,
11 would it refresh your recollection if I said it
12 was located on Chestnut Avenue in Franklin Park,
13 Illinois?

14 A No.

15 Q Do you recall picking up a company called C. P.
16 Clare?

17 A No.

18 Q How about a company called C. P. Hall?

19 A The name is familiar.

20 Q You don't recall anything else?

21 A No.

22 Q No. You have to give your answer out loud for the
23 court reporter to take down.

24 A Yes. It's hard to keep thinking.

25 Q Do you recall picking up waste at a company called

- 1 Cargill?
- 2 A No.
- 3 Q Would it refresh your recollection if I said that
- 4 facility was located in Carpentersville?
- 5 I recall the customer, but not whether it was
- 6 picked up by U. S. Scrap.
- 7 Q Okay. Do you recall a company called Central Can
- 8 Company where you would pick up waste?
- 9 A No.
- 10 Q Do you recall a customer called Central Solvents
- 11 and Chemicals?
- 12 A No.
- 13 Q Do you recall a customer called Chase Products or
- 14 Chase Brass Company?
- 15 A No.
- 16 Q Do you recall a customer called Chicago Decal?
- 17 A The name is familiar.
- 18 Q Do you recall anything else?
- 19 A No.
- 20 Q Would it refresh your recollection if I said it
- 21 was at 3300 North Elston in Chicago?
- 22 A I recall the customer but not whether it was picked
- 23 up by U. S. Scrap.
- 24 Q Do you recall a U. S. Scrap customer called Chicago
- 25 Name Plate?

1 Q.

2 Do you recall a U. S. Scrap customer called
3 Chicago-Rite?

4 A.

5 Do you recall a customer called Chicago Rawhide?

6 A.

7 Do you recall where they were located?

8 In the neighborhood or west of Halsted approximately
9 1st Street.

10 Q. Now, Mr. Talar, you mentioned Chicago Rawhide. Do

11 you also recall hauling for a company called

12 Chicago Sheepskin?

13 A. Yes, I recall that.

14 Do you recall where

15 they were located?

16 I thought it went to, and do you recall the nature
17 of their waste?

18 Very smelly. It was a liquid; had a stench to it
19 that was very bad.

20 Q. Now, do you recall the size or frequency of those
21 loads?

22 A. It was a vacuum tanker, but we only pulled approx-
23 imately 3,000 gallons, and it was a mid-sized
24 customer.

25 Q. Do you recall hauling for a company called Chicago

1 Rotoprint?

2 A No.

3 Q How about a company called Clark Equipment?

4 A No.

5 Q Would it refresh your recollection if I said they
6 were in Aurora?

7 A No.

8 Q How about a company called Coldwell General?

9 A No.

10 Q How about a company called Commander Packaging?

11 A No.

12 Q Would it refresh your recollection if I said it
13 was located in Lisle, Illinois?

14 A I remember an account in Lisle; I don't recall
15 the name of the account.

16 Q Do you recall what kind of waste you picked up
17 there?

18 A No.

19 Q Do you recall hauling from a company called
20 Container Corporation in Carol Stream?

21 A No.

22 Q How about a company called Continental Can Company?

23 A I recall the company, but I don't recall whether it
24 was hauled for U. S. Scrap.

25 Q Do you recall hauling for a company called Corn

1 Products Company or C P C in Argo, Illinois?

2 A I recall the company, but not whether it was hauled
3 for U. S. Scrap.

4 Q How about a company called Cosden Oil?

5 A No.

6 Q Do you recall a company called Crescent Company?

7 A No.

8 Q Do you recall a company called Crown Cork and Seal
9 Company?

10 A I recall the company but don't recall whether U. S.
11 Scrap hauled it.

12 Q Do you recall U. S. Scrap hauling for a company
13 called Culligan Company in Northbrook, Illinois?

14 A No.

15 Q How about a company called Cuneo Press?

16 A Yes.

17 Q Do you recall a company called Custom Organics?

18 A I recall the customer; don't recall whether it was
19 hauled by U. S. Scrap.

20 Q Do you recall U. S. Scrap hauling for a customer
21 called Danley Machine Company?

22 A No.

23 Q Do you recall hauling for a company called Dap Ink?

24 A No.

25 Q Do you recall hauling for a company called Daubert

1 Chemical?

2 A No.

3 Q Do you recall hauling for a company called DeMert
4 and Dougherty?

5 A I recall the customer but not if it was hauled
6 for U. S. Scrap.

7 Q Do you recall U. S. Scrap having a customer named
8 Breehan Paint?

9 A Yes.

10 Q And do you recall where they were located?

11 A It's off Archer Avenue around Kedzie.

12 Q Okay, and do you recall what kind of waste that
13 generated?

14 A Water soluble material.

15 Q And do you recall anything regarding the size
16 or frequency of the load?

17 A The size was a 5,000 gallon vacuum tank; frequency,
18 I would call them a mid-sized customer.

19 Q Do you recall hauling from a company called Du Pont?

20 A I recall the customer but not if U. S. Scrap hauled
21 them.

22 Q Do you recall U. S. Scrap hauling for a company
23 called Echo Products company?

24 A I recall the name. I don't recall where the
25 facility is at.

1 Q Would it refresh your recollection if I said 1949
2 North Cicero in Chicago?

3 A No.

4 Q Do you recall U. S. Scrap hauling for a company
5 called Electronic Plating?

6 A No.

7 Q Do you recall U. S. Scrap hauling for a company
8 called Englander Mattress Company?

9 A Excuse me?

10 Q Englander Mattress Company and 104th and Champlain
11 in Chicago?

12 A No.

13 Q Okay; you mentioned earlier a company called Enter-
14 prise Wire Company. Do you recall U. S. Scrap
15 hauling for a company called Enterprise Paint
16 Company?

17 A Enterprise Paint sounds familiar. The location of
18 the facility--I can't remember the location of the
19 facility.

20 Q Would it refresh your recollection if I said 28th
21 and Ashland?

22 A Yes.

23 Q Do you recall them being a customer of U. S. Scrap?

24 A Yes.

25 Q Okay, and do you recall what kind of waste was

1 100000?

2 A I don't recall the size or type waste.

3 Q Do you recall anything else about that account?

4 A The only thing I can recall, it was a hard--a very
5 hard place to get in and out of with a semi vehicle.

6 Q Do you recall a W. S. Scrap customer called Felt
7 Products Manufacturing in Skokie?

8 A No.

9 Q Do you recall a W. S. Scrap customer called Fiber
10 Bonds?

11 Yes, I do.

12 Q Do you recall where they were located?

13 I believe it was on the west side, near northwest side
14 of Chicago.

15 Q Do you recall what kind of waste was hauled
16 from there?

17 A I recall vacuum tanks.

18 Do you know what was in the waste?

19 A No.

20 Q And do you recall anything about the frequency of
21 the load or the size of the account?

22 A I would say they were a small to medium-sized
23 account.

24 Q Do you recall a W. S. Scrap customer called Flint
25 Ind. Company?

1 A Yes.

2 Q Do you recall where they were located?

3 A I believe it was Elmhurst off of Roosevelt Road.

4 Q And do you recall the kind of waste?

5 A It was an ink or paint waste.

6 Q Do you recall anything about the size or frequency
7 of the load?

8 A The size would vary because the tanker on site
9 would only hold approximately 5,000 gallons, and
10 we could never pump all the material that was in
11 it.

12 So volume would vary between 3,000 and
13 5,000 gallons.

14 Q And how about the frequency?

15 A I would classify them as a small to medium.

16 Q Do you recall a customer called Frederick H. Levey
17 Ink Company?

18 A No.

19 Q How about a company called Fox Valley Manufacturing?

20 A Sounds familiar.

21 Q Would it refresh your recollection if I said they
22 were located in Elgin?

23 A Yes.

24 Q And do you recall the kind of waste?

25 A I believe it was an aqueous waste from spray

1 painting.

2 Q And how about the size or frequency of the load?

3 A The size was 3,000 to 5,000 gallons each trip, and
4 I would classify that small.

5 Q Okay. Do you recall a U. S. Scrap customer called
6 Furnas Electric located in Batavia, Illinois?

7 A No.

8 Q Do you recall a customer called Georgia Pacific
9 Company?

10 A No.

11 Q Do you recall a company called Glidden Paint Company?

12 A I recall the customer but not if U. S. Scrap
13 hauled it.

14 Q Do you recall a customer called Graftec Press?

15 A No.

16 Q Do you recall a company called Graphon, Inc. in
17 Franklin Park?

18 A No.

19 Q Do you recall a U. S. Scrap customer called W. F.
20 Hall Printing?

21 A No.

22 Q Do you recall a customer called Hanna Waterways?

23 A I recall the customer, but I don't recall if U. S.
24 Scrap hauled it.

25 Q Do you recall a U. S. Scrap called Hendrickson

1 Manufacturing in Lyons, Illinois?

2 A No.

3 Q How about a customer called Heritage Ink in Addison?

4 A No.

5 Q Do you recall a customer called Hills-McCanna?

6 A The name sounds familiar; I don't recall their
7 facility, though.

8 Q Do you recall a customer called Hodson Corporation?

9 A No.

10 Q How about a customer called E. F. Houghton?

11 A No.

12 Q Do you recall a client called Hoener-Waldorf in
13 Joliet?

14 A No.

15 Q Do you recall picking up any waste from the Hot-
16 point Division of General Electric in Cicero?

17 A Yes.

18 Q Do you recall what kind of waste that was?

19 A Again, I believe it was an aqueous waste from spray
20 painting, and the underground tank I believe came
21 from an oil-water separator.

22 Q Do you recall the size or frequency of load?

23 A 5,000 gallons. I would classify them as a mid-
24 sized account.

25 Q Do you recall a U. S. Scrap customer called Howell

1 Company that would be at St. Charles, Illinois?

2 A I recall a company in St. Charles that made chairs.

3 The name "Howell"--

4 Q Do you recall what kind of waste you picked up
5 there?

6 A It was a sludgy material, very hard to pick up;
7 I remember that.

8 Q Do you recall where that company was in St.
9 Charles?

10 A Very close to the downtown area.

11 Q And where would you classify them in terms of size
12 of account?

13 A Small account.

14 Q Do you recall a U. S. Scrap customer called Hunt
15 and Wesson?

16 A No.

17 Q How about a customer called International Minerals
18 and Chemicals or I.M.C. in Carpentersville?

19 A No.

20 Q Do you recall a U. S. Scrap customer called ITT
21 Harper Corporation?

22 A No.

23 Q Do you recall a company called Illinois Bronze
24 Coatings?

25 A No.

1 Q Do you recall a customer called Industrial Hard
2 Chrome in Elk Grove Village?

3 A No.

4 Q Do you recall picking up any waste at the
5 Institute of Gas Technology or People's Gas, 35th
6 and Pulaski in Chicago?

7 A I recall the customer; I don't recall if U. S.
8 Scrap hauled it.

9 Q Do you recall a U. S. Scrap customer called
10 Interlake Steel?

11 A Yes.

12 Q Do you recall where they were located?

13 A Riverdale, 135th Street.

14 Q And do you recall what kind of waste they
15 generated?

16 A I remember we did a spill for them on the river.
17 I don't recall hauling anything else from them,
18 though.

19 Q Is that an oil spill?

20 A Yes.

21 Q Do you recall a U. S. Scrap customer called Inter-
22 national Harvester Company?

23 A No.

24 Q How about a customer called International Multi
25 Foods located in Melrose Park?

1 A No.

2 Q Do you recall a customer called Illinois Tool Works?

3 A No.

4 Q Do you recall a customer called J. H. Huber Ink
5 Company?

6 A No.

7 Q Do you recall a customer called Janette and Co.?

8 A No.

9 Q How about a company called Jett Dye Castings?

10 A No.

11 Q Do you recall a customer called Jewel Paint Com-
12 pany?

13 A No.

14 Q Do you recall hauling waste from La Salle Manage-
15 ment Company at the La Salle National Bank Building
16 downtown?

17 A No.

18 Q Do you recall a customer called Leavitt Tube Com-
19 pany?

20 A I recall the customer, but not if U. S. Scrap
21 hauled it.

22 Q Do you recall a U. S. Scrap customer called
23 Libby MacNeal, Libby?

24 A Yes.

25 Q Do you recall where they were located?

1 A 119th Street, adjacent to Interstate 57.

2 Q Do you recall what kind of waste you picked up
3 there?

4 A It was an oil and grease mixture from I believe
5 their grease traps.

6 Q And do you recall size or frequency of loads?

7 A The size was approximately 1,000 to 2,000 gallons,
8 and the frequency was probably two to three times
9 a month.

10 Q Do you recall picking up any waste at Lindbloom High
11 School?

12 A No.

13 Q Do you recall a U. S. Scrap customer called
14 Lawter Chemical Co.?

15 A No.

16 Q Do you recall a U. S. Scrap customer called
17 MacLean-Fogg Company in Mundelein?

18 A Yes.

19 Q Okay. Do you recall what kind of waste they
20 generated?

21 A It was a watersoluble oil mixture.

22 Q And do you recall the size or frequency of those
23 loads?

24 A Size would be 5,000 gallon vacuum tanker. I would
25 classify them as a small to medium account.

1 Q Do you recall a U. S. Scrap customer called Magee
2 Chemical in DesPlaines?

3 A No.

4 Q How about Marathon Oil Company?

5 A No.

6 Q Do you recall a customer called Martin Senour Paint
7 Co.?

8 A No.

9 Q Do you recall a customer called Matherson, Selig?

10 A No.

11 Q Do you recall a customer called McGraw Edison?

12 A No.

13 Q Do you recall a U. S. Scrap customer called
14 Midwest Brass in Franklin Park?

15 A No.

16 Q Do you recall a company called Mobile Company in
17 Kankakee?

18 A No.

19 Q Do you recall a U. S. Scrap customer named Monsanto
20 in Muskatene, Iowa?

21 A Yes.

22 Q Do you recall what their waste was?

23 A It was a liquid material because it was picked up
24 with a vacuum tank. Frequency, I would say it was
25 a small customer.

1 Q Do you recall a U. S. Scrap customer called
2 Morton Chemicals in Elk Grove Village?

3 A No.

4 Q Do you recall a customer called Motive Industries?

5 A No.

6 Q Do you recall a U. S. Scrap customer called
7 Motorwheel Corporation Mendota, Illinois?

8 A Yes.

9 Q And what kind of waste did you pick up there?

10 A We did a one-time cleanup there. I remember it
11 was on a weekend, and we worked all weekend, clean-
12 ing out some clarifier sludge material. We hauled
13 numerous loads out that weekend.

14 Q So to the best of your recollection, that was a
15 one-time occurrence?

16 A Yes.

17 Q And when you say "numerous loads," could you give
18 me an estimate of how much was involved?

19 A I would say somewhere between five and fifteen
20 loads that weekend.

21 Q Would those be tanker loads?

22 A Yes.

23 Q That would be 5,000 gallon tanker?

24 A Correct.

25 Q Do you recall a U. S. Scrap customer called Nalco

1 Chemical in Bedford Park?

2 A No.

3 Q How about a U. S. Scrap customer called Namsco
4 in Bellwood?

5 A No.

6 Q Do you recall a U. S. Scrap customer called Nashua?

7 A No.

8 Q Do you recall a U. S. Scrap customer called
9 National Can Company?

10 A Yes.

11 Q Do you recall where they were located?

12 A The one facility I know of or can remember is
13 La Porte, Indiana.

14 Q And do you recall the nature of the waste?

15 A Water-soluble oil.

16 Q And do you recall anything regarding the size or
17 the frequency of the load?

18 A I would classify them as a medium to large account.

19 Q Do you recall a U. S. Scrap customer called
20 National Precision Circuits in Franklin Park?

21 A No.

22 Q Do you recall a U. S. Scrap customer called
23 National Steel Container?

24 A No.

25 Q Do you recall U. S. Scrap ever hauling any waste

1 from the U. S. Government Nike Silo sites in
2 Jackson Park or Lake Shore Drive?

3 A No.

4 Q Do you recall a U. S. Scrap customer called Out-
5 board Marine in Youngport?

6 A Yes, I recall that.

7 Q And do you recall the nature of their waste?

8 A I recall hauling them out in drums.

9 Q Do you recall what was in the drums?

10 A No, I believe it was just a one-time thing where we
11 might have--we would classify them as a small
12 customer, and to the best of my recollection, it
13 was a one-time thing. We haven't what they had
14 there, and that was all.

15 Q Okay. Do you recall a U. S. Scrap customer called
16 FPI Industries? Our information is, they were
17 initially located in Milwaukee, Wisconsin and then
18 moved to Oak Creek, Wisconsin?

19 A I recall the customer, but not if U. S. Scrap
20 hauled them.

21 Q Do you recall a U. S. Scrap customer called
22 Per-Mixie Steel?

23 A No.

24 Q How about Pierce-Stevens Chemical Co. in Carol
25 Stream, Illinois?

1 A No.

2 Q Do you recall a U. S. Scrap customer called
3 Pittsburg Metals?

4 A No.

5 Q How about a U. S. Scrap customer called Precision
6 Twist Drill Company in Crystal Lake?

7 A No; just the facility in Rhineland.

8 Q Okay. The Triumph Twist Drill?

9 A Oh, yes; I've got them two confused.

10 Q Okay. Do you recall a U. S. Scrap customer called
11 Prefinished Metals in Elk Grove Village?

12 A No.

13 Q How about Premier Paints, also in Elk Grove
14 Village?

15 A No.

16 Q Do you recall a U. S. Scrap customer called
17 Proler-Chicago at 36th and California in Chicago?

18 A No.

19 Q How about a customer called R. A. Briggs in Lake
20 Zurich?

21 A I recall the customer, but not if U. S. Scrap
22 hauled them.

23 Q Okay. Do you recall a customer called R-Lite
24 Chemical Coatings in Geneva?

25 A No.

1 Q Do you recall U. S. Scrap hauling for Rauland Tube
2 Company, a division of Zenith, located in Melrose
3 Park?

4 A No.

5 Q Do you recall U. S. Scrap hauling for a company
6 called Reflector Hardware, also in Melrose Park?

7 A No.

8 Q Do you recall a company called Regal Tube Company?

9 A I recall the name but not if U. S. Scrap hauled it.

10 Q Do you recall a U. S. Scrap customer called
11 Reliable Electric?

12 A No.

13 Q Do you recall a U. S. Scrap hauling for a company
14 called Kensington Iron Company?

15 A No.

16 Q Do you recall if U. S. Scrap hauled for Republic
17 Steel Corporation?

18 A I recall the customer but not if U. S. Scrap
19 hauled it.

20 Q Do you recall U. S. Scrap hauling for a company
21 called Resins, Solvents and Varnishes Company in
22 Chicago Heights?

23 A No.

24 Q Do you recall a U. S. Scrap customer called Revere
25 Brass?

1 A No.

2 Q Do you recall a customer called Rex Chain off Lincoln
3 Avenue in Dalton, Illinois?

4 A Yes, I do.

5 Q Do you recall what kind of waste they generated?

6 A It's a water-soluble oil mixture.

7 Q And do you recall anything regarding size or
8 frequency of the load?

9 A Size would be 5,000 gallons. Frequency would be,
10 we would classify them as small.

11 Q Do you recall a U. S. Scrap customer called
12 Hexene Polymers?

13 A Yes.

14 Q Do you recall where they are located?

15 A It's I believe on Arsenal Road off of Interstate
16 55, and I guess that's Joliet.

17 Q Do you recall the nature of their waste?

18 A An aqueous waste. I would consider them a very
19 large customer.

20 Q Okay. Do you recall a U. S. Scrap customer called
21 Richardson Graphics?

22 A No.

23 Q Would it refresh your recollection if I said they
24 were located on 151st in Orland Park?

25 A Orland Park, you say? No.

1 Q Do you recall a customer called Roper Manufacturing?
2 Company?

3 A Yes, in Kankakee, Illinois.

4 Q And do you recall what kind of waste they produced?

5 A An aqueous waste from their spray booths.

6 Q Okay, and do you recall anything regarding size
7 or frequency of the load?

8 A I would say he would be a small generator.

9 Q Do you recall U. S. Scrap hauling for a company
10 called Rust-Oleum in Evanston?

11 A I recall the customer, but not if U. S. Scrap
12 hauled them.

13 Q Do you recall a U. S. Scrap customer called
14 Schoile Chemical Company in Northlake?

15 A No.

16 Q Do you recall a U. S. Scrap customer called Scott,
17 Inc., Scott, Incorporated?

18 A No.

19 Q Do you recall a customer called Shakeproof in
20 Elgin?

21 A No.

22 Q Do you recall a customer called Signode in Bridge-
23 view?

24 A Yes.

25 Q What kind of waste did they generate?

- 1 A An oil waste.
- 2 Q Do you recall anything regarding size or frequency
3 of the load?
- 4 A Size would be 5,000 gallons per load. I would
5 classify them as a medium account.
- 6 Q Do you recall a U. S. Scrap customer called
7 Sigoli Metal Plating?
- 8 A No.
- 9 Q Do you recall a U. S. Scrap customer called Sinclair
10 and Valentine?
- 11 A No.
- 12 Q How about Size Control in Elk Grove Village?
- 13 A No.
- 14 Q Do you recall a customer called Skill Power Tool
15 in Wheeling?
- 16 A No.
- 17 Q How about a customer called Sommer and Maca?
- 18 A No.
- 19 Q Do you recall a customer called Specialty Coatings
20 in Elk Grove Village?
- 21 A No.
- 22 Q How about Specified Painting?
- 23 A No, no.
- 24 Q Do you recall a U. S. Scrap customer called Spot
25 Nails, Rolling Meadows?

1 A Yes.

2 Q Do you recall what kind of waste they generated?

3 A I believe it was a sludgey aqueous waste from
4 their water treatment. Quantity, I would say between
5 3,000 and 5,000 gallons per pickup.

6 Q And you would term them as a large, small or
7 medium?

8 A Small customer.

9 Q Do you recall an account called Standard T
10 Chemical?

11 A Yes, was one in Chicago Heights. We hauled or I
12 hauled drums out of that facility.

13 Q Do you recall what was in the drums?

14 A No.

15 Q Where would you rank them in terms of size?

16 A Medium.

17 Q Do you recall hauling for Stauffer Chemical Company
18 in Chicago Heights?

19 A I recall the customer but not if U. S. Scrap
20 hauled them.

21 Q Do you recall U. S. Scrap hauling for Stewart
22 Chemical, a paint company?

23 A No.

24 Q Do you recall a U. S. Scrap customer called
25 Stein-Hall in Bridgeview?

1 A No.

2 Q Do you recall a U. S. Scrap customer called
3 Stressan-Reuter in Bensenville?

4 A No.

5 Q Do you recall a U. S. Scrap customer called
6 Stuart Oil Company?

7 A No.

8 Q Do you recall hauling any waste from Texaco
9 Company in Lockport?

10 A Yes, I do.

11 Q Do you recall the nature of the waste there?

12 A I recall it being a 5,000 gallon vacuum tank, but
13 it seems to me it was for a cleanup or a one-time
14 cleanup sort of.

15 Q Do you recall what the nature of the waste was?

16 A No.

17 Q Do you recall a U. S. Scrap customer called
18 Thompson Heywood Chemical?

19 A No.

20 Q How about Thor Power?

21 A No.

22 Q Travenol or Baxter-Travenol?

23 A I recall the customer but not if U. S. Scrap
24 hauled then.

25 Q Do you recall a U. S. Scrap customer called

1 Q What is S. Luchanoff?

2 A

3 Q What is the name of the company in North Chicago?

4 A

5 Q What is the name of the company in S. S. Reduction?

6 A

7 Q

8 Q

9 A

10 Q What is the name of the company in Dolton, Illinois?

11 A

12 Q

13 A

14 Q

15 Q

16 A

17 Q

18 Q

19 A

20 Q

21 A

22 A

23 Q

24 A

25 Q

S. Luchanoff

in North Chicago?

U. S. Reduction

steel

Dolton, Illinois?

union camp in

Chicago in

A. What kind of waste did they generate?

Very sludgy, rubber-covered waste.

Q. What is the name of the company regarding size or frequency of waste?

A. The volume would be from 2,000 to 5,000 gallons

per load, and I would say they were a small

company.

Q. Do you recall a U. S. Steel customer called United

- 1 Wallpaper?
- 2 A No.
- 3 Q Do you recall a customer called Val Spar in
4 Rockford, Illinois?
- 5 A I recall the customer, but not if U. S. Scrap
6 hauled it.
- 7 Q Do you recall a customer called Vandercook?
- 8 A No.
- 9 Q How about Velsicol Chemical?
- 10 A I recall the name or customer, but not if U. S.
11 Scrap hauled it.
- 12 Q Do you recall a customer called Venus Laboratories
13 in Wood Dale, Illinois?
- 14 A No.
- 15 Q Do you recall a customer called Victor Gasket?
- 16 A No.
- 17 Q W. C. Richards?
- 18 A No.
- 19 Q William Wrigley Company?
- 20 A No.
- 21 Q Watner Electric?
- 22 A No.
- 23 Q Warwick Electronics?
- 24 A No.
- 25 Q Do you recall hauling any waste from Western

Electric in Cicero, Illinois?

A I recall the company, but not if U. S. Scrap hauled it.

Q Do you recall U. S. Scrap hauling from Wilson's Sporting Goods?

A No.

Q Do you recall U. S. Scrap hauling from Wyco Tool Company?

A No.

Q How about Wycoff Steel Company?

A No.

Q Do you recall a U. S. Scrap customer called Wyman-Gordon in Harvey?

A Yes.

Q And what kind of waste was picked up there?

A I believe it was an aqueous waste that was either water-soluble or an oil; one or the other.

Q Do you recall the size or frequency of the load?

A I believe it would be a small to medium.

Q Okay.

A They were picked up in 5,000 gallon vacuum tankers.

Q Do you recall hauling from Xerox Corporation?

A No.

Q Do you recall hauling from a company called Wheting Corporation in Harvey, Illinois?

1 A No.

2 Q Do you recall hauling from a company called Wilson
3 and Company in Calumet City?

4 A No.

5 Q Do you recall hauling from a company called Ferro
6 Engineering, also in Calumet City?

7 A No.

8 Q Do you recall hauling any waste from Bulk Terminal,
9 Terminal Transport at 124th and Stony Island in
10 Chicago?

11 A No.

12 Q Do you recall a U. S. Scrap customer called
13 Accutronics?

14 A No.

15 Q Do you recall Advance Transformer?

16 A No.

17 Q Alco-Gravier?

18 A No.

19 Q Do you recall hauling from Allis Chalmers?

20 A Yes.

21 Q And what was the nature of that waste?

22 A Liquid water-soluble oil. They were a small to
23 medium-size account, and the occurrences that
24 began--what struck my memory was, when it rained
25 quite a bit, we hauled a lot of material out of

there. They had a water leak somewhere.

Q Do you recall a Scrap customer called American
Nivet in Franklin Park?

A The name sounds familiar, but I don't know if U. S.
Scrap hauled it.

Q How about a company called Harrison Manufacturing
in Michigan City?

A No.

Q Do you recall a company called Armstrong Chemicals?

A No.

Q Do you recall hauling from a company called B & J
Plastics Manufacturing?

A No.

Q How about Avon?

A I recall the name "Avon," but I don't know if
U. S. Scrap hauled them.

Q Do you recall if U. S. Scrap had a customer
Metz Laboratories?

A No.

Q How about a company called Boyer Schutlz in
Rockford?

A No.

Q Do you recall a U. S. Scrap customer called Bruce
Horn?

A No.

1 A No.

2 Q Do you recall a U. S. Scrap customer called
3 Delaware Plastics?

4 A No.

5 Q Do you recall a customer called Desa Industries
6 in Iarg Forest?

7 A No.

8 Q Do you recall a customer called Dublin Company?

9 A No.

10 Q Do you recall a customer called Dutone?

11 A No.

12 Q Elgin Machine?

13 A No.

14 Q General Tool and Plastics?

15 A No.

16 Q Do you recall U. S. Scrap hauling for Ford Motor
17 Company?

18 A I recall the customer, but not if U. S. Scrap
19 hauled them.

20 Q Do you recall if U. S. Scrap hauled from Frank
21 Currau Company?

22 A No.

23 Q Do you recall a customer called Gard Industries?

24 A No.

25 Q Do you recall a customer called Handschy Chemical?

1

A No.

2

Q Do you recall a customer called Hausner Hard Chrome?

3

A No.

4

Q Okay. Mr. Williams, do you recall U. S. Scrap

5

handling a lot of boiler parts for a Corporation?

6

A No.

7

Q Do you recall a customer called Hooker Glass?

8

A No.

9

Q Do you recall a customer called the Glass Company?

10

A No.

11

A No.

12

Q Do you recall a customer called Catalog Service?

13

A No.

14

Q Do you recall a customer called John Hill

15

Products?

16

A No.

17

Q Do you recall a customer called Terry Chemical?

18

A No.

19

Q Do you recall a customer called Wisner?

20

A No.

21

Q Do you recall a customer called Luminous Ceiling in

22

Atlanta, Georgia?

23

A No.

24

Q Do you recall a customer called Mass & Waldstein?

25

A No.

1	Q	Marvel Metal?
2	A	No.
3	Q	Metal Industry?
4	A	No.
5	Q	Metal Reclaiming Corporation?
6	A	No.
7	Q	Do you recall a customer named Midwest Electric?
8	A	No.
9	Q	Do you recall a customer called Mirror Reflector
10		Service?
11	A	No.
12	Q	Do you recall picking up any waste at Mobil Oil
13		in Cicero, Illinois?
14	A	No.
15	Q	Do you recall a customer called Modine Manu-
16		facturing Company?
17	A	No.
18	Q	Do you recall a customer called Moffet Technical
19		Center?
20	A	No.
21	Q	Do you recall a customer called National Bronze
22		in Franklin Park?
23	A	No.
24	Q	How about a customer called National Celofilm?
25	A	No.

- 1 facturing in Addison, Illinois?
- 2 A No.
- 3 Q John & Hass?
- 4 A No.
- 5 Q Bole Print Packaging Company?
- 6 A No.
- 7 Q St. Charles Manufacturing?
- 8 A No.
- 9 Q Did U. S. Scrap ever pick up any waste from
- 10 Sherwin-Williams Company?
- 11 A No.
- 12 Q Do you recall a U. S. Scrap customer called
- 13 Stenograph?
- 14 A No.
- 15 Q A customer called Transport Service?
- 16 A No.
- 17 Q Do you recall a customer called Western Community?
- 18 A No.
- 19 Q Do you recall a customer called Young Spring & Wire?
- 20 A No.
- 21 Q Do you recall a customer called Technical
- 22 Products?
- 23 A No.
- 24 Q Mr. Mac Farlane, you earlier recalled something
- 25 about one other stop that you made in connection

1 with your pickups for U. S. Scrap. Can you
2 describe what that was?

3 A I recall the stop because it was so much out of
4 the ordinary. I think it was General Electric
5 out in Morris or Joliet on--I believe on Route 6.
6 The reason I can remember it being so much out
7 of the ordinary is that I had to remove all of my
8 change, wallet, keys on my person, and the truck
9 was inspected, and a foreman followed me from the
10 time I left the guard shack while I pumped the
11 lead out of a pit, I believe, until the time I
12 got back to the guard shack, and I believe that I
13 had a red button that I was issued at the guard
14 shack on my way in.

15 Those are the only reasons I can remember
16 that facility.

17 Q Do you recall anything else regarding the location
18 of the facility?

19 A No. It was just between Joliet and Morris, and I
20 believe it was on old Route 6 in a new industrial
21 area at that time.

22 Q Other than the companies I've gone over
23 with you today, do you recall any other customers
24 from whom you picked up waste while you worked at
25 U. S. Scrap?

C E R T I F I C A T E

I, MARY ANN OWCZAREK, being a qualified and competent shorthand court reporter, and being first duly authorized to administer said oath, do hereby certify there appeared before me RONALD MAC FARLANE, deponent herein, on the 1st day of September, 1988, at 507 State Street, Hammond, Indiana, who was thereupon duly sworn by me to testify the truth and nothing but the truth in response to questions propounded to said deponent relating to the above-captioned cause now pending and undetermined in the said court.

I further certify that I then and there reported in shorthand the testimony so given at said time and place, and the testimony was thereafter reduced to typewriting from my original shorthand notes, and the foregoing transcript is a true and accurate record of said testimony given by said deponent.

I further certify that I am not related by blood or marriage to any of the parties to said suit, nor am I an employee of any of the parties or of their attorneys or agents, nor am I interested in any way, financially or otherwise, in the outcome of said litigation.

I further certify that after said deposition had been so transcribed, it was read over by the said witness and signed by him.

Dated at Hammond, Indiana, on the _____ day of _____, 1988.

Court Reporter

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN THE MATTER OF:)

U.S. SCRAP CORPORATION,)
Chicago, Illinois,)

-and-)

9TH AVENUE DUMP,)
Gary, Indiana.)

The discovery deposition of ROBERT
THOMPSON, taken in the above-entitled cause, before
Charles R. Zandi, C.S.R., a Notary Public within and
for the County of Cook and State of Illinois, at
111 West Jackson Boulevard, Suite 300, Chicago,
Illinois, on August 18, 1988, at the hour of
9:15 o'clock a.m.

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REPORTED BY: CHARLES R. ZANDI, CSR

1 APPEARANCES:

2 U.S. EPA, REGION V

3 BY: MR. EDWARD J. KOWALSKI

4 MR. MARK THOMAS

5 230 South Dearborn Street, Suite 2600

6 Chicago, Illinois 60604

7
8 Appeared on behalf of the
9 Environmental Protection Agency.

10 * * * * *

11 I N D E X12 EXAMINATIONS13 PAGE

14 WITNESS: ROBERT THOMPSON

15 Examination by Mr. Kowalski

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1 MR. KOWALSKI: Would you swear in the witness,
2 please.

3 (Witness sworn.)

4 MR. KOWALSKI: For the record, this will be the
5 deposition of Mr. Robert Thompson, T-h-o-m-p-s-o-n,
6 taken pursuant to a subpoena issued under the
7 authority of the Superfund Amendments and
8 Reauthorization Act, Section 122(e).

9 ROBERT THOMPSON,
10 called as a witness herein, having been first duly
11 sworn, was examined and testified as follows:

12 EXAMINATION

13 BY MR. KOWALSKI:

14 Q Mr. Thompson, as I explained to you a
15 little earlier, we are involved with an
16 investigation of two Superfund sites, those being a
17 site I'll refer to as 9th Avenue Dump, located at
18 approximately 9th and Cline Avenues in Gary,
19 Indiana, and the U.S. Scrap site, which is located
20 at approximately 122nd or 123rd and Cottage Grove on
21 the South Side of Chicago.

22 The court reporter will be taking down your
23 testimony, so I ask that you keep all of your
24 responses out loud. I also ask that you interrupt

1 me if you don't understand any questions.
2 Otherwise, I'll assume that you understood the
3 question and answered truthfully.

4 Okay. Mr. Thompson, could you tell me your
5 date of birth.

6 A April 14th, 1932.

7 Q And are you currently employed?

8 A Yes.

9 Q And where is that?

10 A S.E.T. Environmental Service.

11 Q And does S.E.T. stand for anything?

12 A Yeah. That's just the three bigshots'
13 names, the three people who own it.

14 Q And where are they located?

15 A 13840 South Halsted, Riverdale, Illinois.

16 Q And how long have you been employed there?

17 A Well, they just bought our company out. I
18 worked for Mid-America, and they just bought us out,
19 so I've been there a year.

20 Q Did Mid-America occupy the same facility?

21 A Yes.

22 Q And what is your position or job at S.E.T.?

23 A Truck driver.

24 Q Was that your same job at Mid-America?

1 A Yes. Well, also boss at Mid-America, too.

2 Q Also a boss?

3 A Yes, I was.

4 Q How long did you work at Mid-America before
5 it was sold to S.E.T.?

6 A Ten years.

7 Q So, that would be approximately 1977
8 through 1987?

9 A Right.

10 Q And your job as truck driver involves what,
11 generally?

12 A Hauling hazardous waste.

13 Q And prior to Mid-America, where were you
14 employed?

15 A Liquid Waste, which -- they're out of
16 business now, in Franklin Park.

17 Q Do you recall the address in Franklin Park?

18 A No, I don't. They're not there no more
19 anyways. I just know it's off of --

20 Q How long did you --

21 A I think I'd been there four years. I think
22 I --

23 Q So, that would be approximately 1973
24 through 1977?

1 A Um-hum.

2 Q That's yes?

3 A Yes.

4 Q And were you employed as a truck driver by
5 Liquid Waste?

6 A Right.

7 Q And where were you employed prior to Liquid
8 Waste?

9 A Steve Martel's, U.S. Scrap.

10 Q Was your employer U.S. Scrap Corporation?

11 A Right.

12 Q And how long were you employed there?

13 A Four years.

14 Q So, that would be approximately 1969
15 through 1973?

16 A Right. You know, I don't know if that's
17 really the right dates, but I --

18 Q That's the general time frame?

19 A Somewhere around there. It's been so long,
20 so like --

21 Q Sure. Sometime the late '60s, early '70s?

22 A Yes.

23 Q And were you employed as a truck driver at
24 U.S. Scrap?

1 A Yes. That and the boss.

2 Q And during the time you were employed at
3 U.S. Scrap, did you work at that particular facility
4 located at about 122nd and Cottage Grove?

5 A That's right. That's where our place was.

6 Q Mr. Thompson, where were you employed prior
7 to going to U.S. Scrap?

8 A Dan Raymond Construction.

9 Q Is that here in Chicago?

10 A 119th and Halsted in Chicago. They're out
11 of business now, too.

12 Q And how long a time period were you
13 employed by them?

14 A I think eight years or something.

15 Q Mr. Thompson, your subpoena requested that
16 you bring any documents that you had that related to
17 the two sites that we're here about today. Did
18 you --

19 A I don't have none.

20 Q Okay. If I could just briefly go into your
21 education, sir, what was the uppermost extent of
22 your formal schooling?

23 A I went through high school.

24 Q So, you graduated high school?

1 A Right. Tilden Tech, 4747 Union.

2 Q And what year was that?

3 A When I graduated?

4 Q Yes.

5 A In '52.

6 Q Did you have any formal schooling after
7 that?

8 A No. I was in the Marine Corps then.

9 Q Okay. And how long were you in the Marine
10 Corps?

11 A Three, three years.

12 Q Okay. Were you honorably discharged?

13 A Yes.

14 Q Mr. Thompson, have you ever been convicted
15 of a felony?

16 A No.

17 Q Have you had any trade school education
18 or --

19 A Well, that's what Tilden Tech was, a trade
20 school.

21 Q Okay. Anything after Tilden?

22 A No.

23 Q Okay. Could you tell me the circumstances
24 by which you came to be employed by Mr. Martel at

1 U.S. Scrap?

2 A For the money. It was good pay. It was a
3 lot of hours, you know. At that time, we were
4 union.

5 Q You were union?

6 A Yeah, they were union.

7 Q Which union did you work out of, or which
8 local?

9 A That was 731.

10 Q Is that --

11 A That's a garbage thing, garbage union.

12 Q Are you still a member?

13 A No.

14 Q Where was your union hall?

15 A Jeez, I -- I think someplace downtown here.
16 I don't know where it's at.

17 Q Your work at Dan Raymond Construction, did
18 that involve truck driving?

19 A Yes. That's -- they haul big sewer -- big
20 concrete pipes that they put in the ground.

21 Q And did they then go out of business? I'm
22 trying to explore what caused you --

23 A You know, they've been many years in
24 business and stuff like that, and they just

1 finally -- there was no money in it, I guess, and
2 they finally folded up.

3 Q Okay. And how was it that you became
4 employed at U.S. Scrap? Did you respond to an ad
5 or --

6 A Jeez, I can't remember offhand, but I just
7 probably heard from another driver. And they were
8 paying good. See, I worked for Dan Raymond in the
9 daytime and worked for U.S. Scrap at night.

10 Q I see. So you worked for --

11 A I worked both jobs at that time.

12 Q When you told me you worked at U.S. Scrap
13 four years, does that include the time you were
14 working both jobs?

15 A Yeah. I worked -- well, I think I quit
16 after that -- after I became boss, because they were
17 paying good money at the time, and I just quit Dan
18 Raymond and went to work for Martel only.

19 Q Did you know Mr. Martel prior to going to
20 work for U.S. Scrap?

21 A No, I did not.

22 Q Is there anything that would help you
23 recall approximately what year that you went to work
24 for U.S. Scrap, any kind of political event or thing

1 in your life or in the world that was happening?

2 A No.

3 Q So, you just think it was in the late '60s?

4 A Yeah.

5 Q Okay. When you first began working for
6 Mr. Martel, it was as a truck driver at night?

7 A Right.

8 Q Did operations at the U.S. Scrap facility
9 go on around the clock at that time?

10 A Yes, it did.

11 Q What kind of truck did you drive?

12 A Mack.

13 Q Was that a tanker or a flatbed?

14 A No. It's a semi, you know, and then you
15 hook up tankers or flatbeds, or else a freight box.

16 Q During the time you worked at U.S. Scrap,
17 how many trucks did they operate?

18 A I think seven.

19 Q Do you recall how many, for want of a
20 better term, attachments they had for those in terms
21 of tanks or flat beds?

22 A What do you mean by a better word? They
23 were all new trucks.

24 Q When you say "trucks," you're referring

1 only to the cab assembly?

2 A To the semi, to the cab itself, right, sir.

3 Q Okay. How many tank attachments or tanker
4 trailers did they have?

5 A I can't recall offhand.

6 Q Do you recall the sizes of the tanker
7 trailers?

8 A Yeah. I think they were 32 foot or
9 something like that.

10 Q Do you recall in terms of gallons?

11 A How many gallons it holds?

12 Q Yeah.

13 A 5,000.

14 Q Did they have tankers larger than that, or
15 were they all pretty much 5,000?

16 A No. I think we had a milk wagon, which
17 would probably hold about 8,000, something like
18 that.

19 Q Were the number of people employed out
20 there pretty much constant during the four years you
21 worked there?

22 A Yes. There were a lot of Mexicans, which
23 didn't have no rights, you know, like a green card
24 or whatever they call it.

1 Q Transitory labor types?

2 A Right. Most a lot of the laborers, yeah.

3 Q How many people were employed out there
4 totally at any one time?

5 A Oh, I'd say maybe at least 25.

6 Q 25?

7 A Yes.

8 Q And I assume those were broken down
9 according to different jobs?

10 A Yeah, different shifts that they worked and
11 stuff.

12 Q Okay. How many shifts were there?

13 A Oh, I imagine -- well, it could have been
14 at least two, at least 12 hours or better a day they
15 worked.

16 Q At what period of time did you become a
17 boss out there?

18 A After that other guy quit that -- what was
19 that guy's name that you said?

20 Q Bob Baich?

21 A Yeah, Bob Baich. I think he went down to
22 Mexico or something like that.

23 Q Do you recall just approximately how long
24 you were there before Baich quit and you became

1 boss?

2 A How long he was there?

3 Q How long you were there when you became
4 boss. Was it after a year or after two years?

5 A Well, I think about two and a half, two
6 years, something like that, and then I became a
7 boss. And then he came back after that.

8 Q Were you still there when he came back?

9 A Yes. And I went back driving. A little
10 bit after that, I quit.

11 Q What caused you to quit?

12 A Well, actually Martel sold the company to
13 Liquid Waste. He just let everybody go, and that
14 was it.

15 Q Do you recall who ran Liquid Waste that he
16 sold to?

17 A Let me think of their names. I can't
18 remember offhand. I'll think of it. I'll let you
19 know when I think of it.

20 Q Okay.

21 A He bought all the accounts.

22 Q He bought all the accounts?

23 A Right. Which he didn't have all the
24 accounts.

1 Q Can you describe generally for me your
2 duties as a truck driver at U.S. Scrap?

3 A Going to the generators, pick up the
4 liquid, take them back to the yard, and then they
5 would put it in a big tank. He had like five, five
6 big tanks there which holds approximately 25,000
7 gallons each.

8 Q Were those above-ground tanks?

9 A Right.

10 Q Before I digressed here, we -- you had
11 mentioned there were about 25 people worked out
12 there at any given time, divided by shift.

13 A With the Mexicans and stuff like -- you
14 know, they did all the drums, cleaned up, you know,
15 emptied the drums out, you know, all that stuff.
16 And we took the drums and put them into a big van,
17 and they would sell the drums to drum people.

18 Q In addition to those Mexican laborers --
19 about how many of those were out there?

20 A How many Mexicans?

21 Q Of the 25, how many would be laborers?

22 A The majority was the Mexicans, really.
23 Because really, we only had seven drivers in the
24 daytime and seven at night. And we worked like, you

1 know, two shift.

2 Q So, it would be seven day drivers and seven
3 night drivers?

4 A Right, somewhere around there.

5 Q And there was -- Bob Baich would be the
6 foreman when you started there?

7 A Right. He was days, and I was night
8 foreman.

9 Q Okay. Did Steve spend a lot of time out on
10 the site?

11 A No. He was mostly in the scrap business,
12 you know, picking up scrap and stuff. That's what
13 he mostly did.

14 Q Other than yourself, can you tell me who
15 the other drivers were?

16 A I just know -- I know Ronny McFarland. I
17 know Earl Klepster, and really, a lot of guys, I
18 just don't remember.

19 Q Were there any other jobs or positions out
20 there other than the laborers who worked with the
21 drums and the truck drivers and the foreman?

22 A No.

23 Q Were there any mechanics employed?

24 A Yeah, that was with Earl, mechanic. He

1 worked on the trucks for us. He wasn't involved in
2 anything but working with trucks. That's why he and
3 I was bosses.

4 Q I forget his first name, but I think it's
5 Ron. Was Ron Brown a truck driver?

6 A Are you talking about Leroy Brown?

7 Q Leroy Brown.

8 A Right. He's still working for them.

9 Q Right. He works at Paxton out there now.

10 A Right.

11 Q Was he a truck driver out there?

12 A Yes, he was. He was the No. 1 driver.

13 Q Could you describe the operations a little
14 bit for me, Mr. Thompson, in terms of the actual
15 paperwork and work involved with picking up a load
16 from a customer from the time you would first get a
17 call or you'd first get some indication that you had
18 to go out and make a pick-up? How did that work?

19 A You would have a book, like, with -- with
20 our name on it, what scrap haulers, and you would go
21 to the generator, get your liquid, you'd write it
22 down, bring it back, and put it in the tank.

23 Q All right. Who would tell you you had to
24 go to pick up a load at a particular generator?

1 A Well, Bob Baich used to be the boss in the
2 daytime, and then they would call in -- the
3 generators would call in and say, "Come pick up our
4 waste."

5 Q Okay. So, it would be initiated by the
6 generator calling in?

7 A Yes, it would.

8 Q Were there also accounts, regular accounts
9 that you'd know to pick up at a certain time?

10 A Yes, there was accounts, right. Mostly,
11 the generators call you, most of the accounts.
12 They'd tell you when they're filled up, and then you
13 would come out there and pick up the liquid.

14 Q Who would receive that call? Would that be
15 be the foreman who would receive that?

16 A It would be the foreman, right.

17 Q Were there any clerical or office personnel
18 that worked onsite?

19 A Not onsite, but they were at 115th and --

20 Q And Kensington?

21 A And Kensington, right.

22 Q Was that where the main office was?

23 A Yes.

24 Q And when someone called in and requested a

1 pick-up, would the driver then be given a load
2 ticket or --

3 A Right. The driver would be given a load
4 ticket to go up and pick up.

5 Q Okay. What kind of information would be on
6 the load ticket?

7 A It would tell you the name of what the
8 liquid was and how many gallons, and the generator
9 would have to sign it. That's how we get paid.

10 Q So, the load ticket would state what the
11 liquid was and how many gallons were going to be
12 picked up?

13 A Right.

14 Q And I presume it had the facility's name on
15 it, or did it?

16 A The generator's name would be on it, so --
17 the facility, I guess, and it would have our site
18 down below.

19 Q It would be on preprinted letterhead for
20 U.S. Scrap?

21 A Right, right.

22 Q Okay. Was the letterhead U.S. Scrap? Is
23 that how it read?

24 A Yes.

1 Q Did any of that letterhead ever have U.S.
2 Drum on it?

3 A It could have. Because we probably picked
4 up drums.

5 Q The trucks themselves that you drove, did
6 they have any company logo or name --

7 A U.S. Scrap.

8 Q U.S. Scrap Corporation?

9 A Right.

10 Q Did they have any other name on them?

11 A I can't recall.

12 Q Do you recall if they ever had Liquid
13 Engineering on them?

14 A Yes, that's right.

15 Q Did they ever have U.S. Drum or U.S.
16 Debarreling on them?

17 A I think so. I'm not sure, though. I don't
18 recall. But I'm pretty sure it was, because he used
19 a lot of names.

20 Q As far as you know, Mr. Thompson, was there
21 any kind of logic as to when one particular name was
22 used as opposed to another?

23 A No. We weren't -- we weren't worried about
24 that. We just know he owned all the companies what

1 they call. It's probably most likely tax purposes,
2 I guess.

3 Q So, you had a bunch of trucks in the yard.
4 Some would say U.S. Scrap; some would say Liquid
5 Engineering. And when you had to pick up a load,
6 you would, I presume, take whichever truck was
7 available regardless of what name was on it?

8 A Right. They were all one company.

9 Q And the load tickets and the other
10 paperwork that was around, did that also have these
11 other names on it?

12 A I can't recall.

13 Q Were you paid by check?

14 A Yes.

15 Q And was that --

16 A Union wages were 5.05 an hour at that time.

17 Q Was that drawn on U.S. Scrap Corporation?

18 A Right.

19 Q And Mr. Martel signed those checks?

20 A I think there was another man involved in
21 it, that he used to sign the check. I don't think
22 Mr. Martel put his name on it.

23 Q Do you remember David Head?

24 A That's the man.

1 Q And do you recall what David Head's
2 position --

3 A Yes, I know him very good. He's a very
4 nice person. He died. I think he inherited some
5 money, and I think he had trouble -- he drank a lot,
6 and -- I remember his desk used to be all cluttered
7 up with all kinds of papers and stuff like that. He
8 was a very nice man.

9 Q Mr. Head was involved with the
10 accounting-type operations?

11 A Right.

12 Q Okay. This load ticket that the driver
13 would receive instructing him to go make a pick-up,
14 was there more than one copy of that?

15 A Yes. Because you have to leave one with
16 the generator.

17 Q Okay. How many copies total were there?

18 A I imagine three.

19 Q So, the driver would take the load ticket,
20 get in the truck, and go to the generator?

21 A Right.

22 Q Okay. When he picked up the load, what
23 would he then do with that load ticket?

24 A He would have the generator sign it and

1 give him a copy of it and then bring the other two
2 copies back.

3 Q And what would then happen with those other
4 two copies that the driver kept?

5 A I imagine one stayed with us and one
6 went -- well, actually, both of them went probably
7 to the office, and then they had to bill the
8 customer.

9 Q When you say both went to the office, was
10 that the office at 115th and Kensington?

11 A Right. They would come back to us first,
12 and then we'd put the liquid in the tanks; and from
13 there, most likely, copies went to the office in
14 order to get paid from the generator.

15 Q When you as a driver, Mr. Thompson, came
16 back with a load, what would you then do in terms of
17 unloading it?

18 A It would go into tanks that we put it in,
19 and then the night crew, they'd dispose it over
20 there by that guy over there by C.I.D, which is
21 C.I.D. now. That's before they ever had EPA papers
22 now. Because we didn't know anything about --
23 everybody was dumb when it come to that. That's why
24 everybody's sick probably nowadays. Because I've

1 been in the business now for probably 25 years, in
2 waste.

3 Q You're going to have to help me out here.
4 I'm trying to envision the U.S. Scrap property
5 itself. It runs along the railroad tracks --

6 A Yes. I think he -- I think he owned two
7 acres, something like that, and he rented three and
8 a half acres from the railroad.

9 Q Okay. It ran lengthwise in a north-south
10 direction, correct?

11 A It ran north and south right off of 115th.
12 You had to go down that way, 115th, and right next
13 door to that stainless steel place there.

14 Q Right. And the west boundary of the site
15 was the railroad tracks, correct?

16 A Yes, it was.

17 Q Okay. And do you recall an old -- it might
18 not have been old at that time, an incinerator on
19 the side --

20 A Yeah. He had an incinerator built there.
21 That's where he was supposed to dispose of all
22 liquids at that time. It was supposed to be burned
23 and go into the atmosphere.

24 Q Was the site fenced at all?

1 A No.

2 Q Okay.

3 A No, there was no room hardly around there.

4 Q Was there one entrance to the site or more
5 than one entrance?

6 A One entrance.

7 Q Okay. Where was that located? The north
8 or south --

9 A 115th -- you had to come down 115th going
10 south.

11 Q So, the entrance was located on the north
12 side of the lot?

13 A Yes, it was.

14 Q Where was the incinerator located?

15 A Right by our office.

16 Q It was located in the center of the site?

17 A Right.

18 Q And your office was also located right in
19 the center of the site?

20 A Yes.

21 Q When you say, "office," that was a trailer,
22 right?

23 A There was a trailer, and then there were
24 grain elevators there.

1 Q The grain elevators were right next to the
2 trailer?

3 A Well, it was right by the burner.

4 Q How many grain elevators were there?

5 A Oh, there must have been at least three or
6 four, something like that.

7 Q And what were those used for?

8 A They were empty.

9 Q Was waste dumped in there?

10 A I don't recall.

11 Q Now, the five tanks that you said --

12 A Yes.

13 Q -- you would pump the liquid into and store
14 prior to dumping, where were those located?

15 A On top of the hill when you come down.

16 Q Okay. So, were those north or south of the
17 office?

18 A North of the office.

19 Q Now, were just liquids from the tanker
20 loads pumped in there, or were the drum contents
21 also put in there?

22 A No. The drum contents. They had a dock,
23 and they went into a tank, and then we would pump
24 that tank out.

1 Q And that was an underground tank right?

2 A Yes, it was.

3 Q So, there was a dock built above ground.
4 The truck would pull up next to that, and the drums
5 would be unloaded and dumped --

6 A Yeah. That's where you had Mexicans that
7 dumped it from the trough and into the steel tank,
8 which is underground.

9 Q And then the laborers would clean out the
10 drums, and those would be put in a van for resale?

11 A Right, in the van and sold it to the drum
12 people.

13 Q If the drums were in poor condition, would
14 those be dumped with the --

15 A They were smashed up. They would smash
16 them up and then junk them.

17 Q Where were those junked?

18 A At that time, I imagine they went to the
19 scrap yards, probably.

20 Q Would the load tickets show whether the
21 pick-up was a drum pick-up versus a tanker pick-up?

22 A Yes, it would. It would have on there, "80
23 drums," or whatever you picked up, "70 drums."

24 Q In addition to the load ticket that was

1 used, would the driver get any other kind of
2 documentation from the generator that he had to
3 sign?

4 A Sometimes they would probably give you
5 their copy of their -- your -- their place like --

6 Q Their invoice?

7 A Yeah, invoice or something like that you
8 had to have. In order to get paid, I guess,
9 sometimes, you had to have an invoice number on
10 them.

11 Q Would the driver keep a copy of that or
12 just sign it and give it back?

13 A No. He would sign it and then give the
14 driver a copy, and then it went to the office.

15 Q When the driver got back with the loads and
16 had those copies of the load tickets and any
17 invoices, would he give those to the foreman?

18 A Yes, he would.

19 Q And during the time you acted as a foreman,
20 what would you then do with those?

21 A We would gather them all up, and then we
22 would send them to the office.

23 Q Anyone in particular at the office who
24 would take those?

1 A No, I wouldn't know that. Two girls
2 working there at the time. I can't recall their
3 names or anything.

4 Q Do you recall a Lynn or Linda?

5 A Lynn used to work for us.

6 Q Lynn worked in the trailer on the site?

7 A She could come up.

8 Q Do you recall Lynn's last name?

9 A Tyree.

10 Q Tyree?

11 A Tyree. Don't ask me how to spell it.

12 Q That was my next question.

13 A Tyree. That's all I know, Lynn Tyree.

14 Q Do you recall where she lived?

15 A My wife knows where she lives, but I don't.

16 Q And Lynn was --

17 A She become a boss after that. She worked
18 for us, and then I was the boss; and then I broke
19 her into the office part, and she took over.

20 Q She basically just worked in the office,
21 right?

22 A Right.

23 Q Does she still work for Steve?

24 A No. But she knows him. She's real good

1 with Maude. That's Martel's wife.

2 Q The other thing I forgot to tell you,
3 Mr. Thompson, is if at any time you want a break to
4 stretch your legs, go to the washroom, get a cup of
5 coffee --

6 A I want to get it over with.

7 Q Other than the load tickets and any copies
8 of invoices the drivers would get, are you aware of
9 any other lists of customers or accounting records
10 that were kept in the course of day-to-day business
11 operations?

12 A Do I know the name of the companies,
13 generators, is that what you said?

14 Q No. Do you know whether any other
15 paperwork was kept with the name of the generators
16 on it?

17 A Just like I said, if that -- you had to
18 have a P.O. number on that, like that, that went to
19 the office, but we didn't keep that.

20 Q You mentioned earlier that there was a book
21 the foreman would have with the generators, is that
22 correct?

23 A Yes. They would have a list of all
24 accounts for the month that we did. It would know

1 exactly how many generators we picked up in a
2 month's time.

3 Q Who prepared that list?

4 A We would have that -- Bob Baich would have
5 that, you know, and he'd write it down. And my
6 night, I'd have to write down each generator that I
7 went to and picked up.

8 Q And that was just kept in the trailer on
9 the site?

10 A Right. That was sent to the office
11 after -- you know, probably during the end of the
12 week.

13 Q Mr. Thompson, I would like you, to the best
14 extent you can, to provide me with the names of any
15 generators you can recall, either that you picked up
16 from or that any of the other drivers picked up from
17 that you recall while you were a foreman out there.

18 I have some names here that I'll go over
19 with you later; but before we do that, just if you
20 could recall off the top of your head.

21 A Rex Chain Belt, which they're not in
22 business no more.

23 Q That's Rex Chain Belt?

24 A Um-hum. They're in Riverdale.

1 Q Do you recall where in Riverdale?

2 A Right off of Lincoln Avenue. That's all I
3 know. You could see their sign right there by the
4 railroad, right there by the police station.

5 Q What kind of waste did they generate?

6 A They had a stamp machine that was oil and
7 water.

8 Q Do you recall how much they generated?

9 A About 15,000 a month.

10 Q 15,000 gallons a month?

11 A Um-hum. Yes.

12 Q Would that be picked up in a tanker or
13 drums?

14 A Yes, it would be.

15 Q Tanker?

16 A It would be picked up in a tanker.

17 Q Were they a long-time customer or --

18 A Right, they were.

19 Q Were they a customer the entire time you
20 were out there?

21 A Yes.

22 Q Okay. Other companies?

23 A One in Joliet was -- Rexene? They changed
24 the name now. It's Mobil. But we used to pull for

1 Mobil, too, which is -- Mobil is on one side, and
2 then they bought the other one out, I think,
3 around -- Rexene. That's all I remember, the name.
4 But that was a big company.

5 Q And where were they located?

6 A In Joliet, right off of Joliet Arsenal
7 Road, which now is -- Mobil Chemical Company bought
8 them out.

9 Q Did you haul for both Mobil Oil and Mobil
10 Chemical?

11 A It was Mobil Chemical. That's when it was
12 on one side of the street. And then it was --

13 Q And then Rexene was across the street?

14 A Right.

15 Q And what kind of waste did Mobil generate?

16 A Oil.

17 Q Oil from what? From what operation?

18 A I don't know. But we had a tank there, and
19 we used to suck the tank out. We had like a
20 7,000-gallon tank that we left onsite, and they
21 would put in it there, and we would suck the tank
22 out.

23 Q How much did you pick up from there?

24 A Every time we picked up, it was 5,000

1 gallons.

2 Q Do you recall how often you picked up?

3 A Maybe twice a week, maybe once a week.

4 Q And how about Rexene? What kind of waste
5 did they generate?

6 A Theirs was poly -- you know, plastic stuff,
7 with water, and it looked white.

8 Q Okay. And how much did you pick up from
9 them?

10 A Oh, lots, steadies, maybe five, six, seven
11 loads a week, each one 5,000 gallons. That was our
12 biggest generator.

13 Q Mr. Thompson, are you familiar with the 9th
14 Avenue site?

15 A No. I didn't work that site. That was
16 mostly at nighttime.

17 Q Okay.

18 A Earl was on that site. I was on the one at
19 22nd Street.

20 Q Did you ever, for any reason, go to the 9th
21 Avenue site?

22 A No. I know where it's at, but I don't
23 think I remember -- maybe I've been there once or
24 twice, but -- I think I picked up drums there, that

1 I recall.

2 Q Do you know how it was decided whether
3 waste went to 9th Avenue or it went to U.S. Scrap?

4 A No, I don't.

5 Q But you have knowledge that 9th Avenue was
6 mostly used at night?

7 A Right.

8 Q Okay. Do you know when Mr. Martel first
9 started using the 9th Avenue site?

10 A Well, no, I don't, really. No, I don't
11 remember.

12 Q Is there any event or occasion you recall
13 when it started its use?

14 A No. Most of it was 22nd Street, where we
15 hauled everything out of there, and then we just
16 expanded.

17 Q So, 9th Avenue was pretty much used as an
18 expansion once U.S. Scrap was going, at some point
19 in time?

20 A Right, yes.

21 Q Okay. Other generators that you either
22 picked up from or you know that were picked up from?

23 A Dreeblan Paint.

24 Q I'm sorry?

1 A Dreeblan Paint.

2 Q Do you recall where they were located?

3 A 48th, right off of Crawford, right off of
4 there. 48th Street, 48th Place.

5 Q I know it's been a long time and you've
6 been involved with a lot of companies, and I'm
7 asking you to stretch your memory here, but I really
8 appreciate it.

9 It was -- would about 3400 West 48th Place
10 in Chicago be right?

11 A Yes, correct.

12 Q And what kind of waste was picked up from
13 there?

14 A Paint.

15 Q Paint?

16 A Well, water-based paint.

17 Q And how much was picked up from there?

18 A We used to pick up a load a day.

19 Q Would that be a 5,000-gallon load?

20 A Yeah. We had a tank stationed there, too.
21 Now, I'm telling you, there was no EPA papers now,
22 which we know is wrong now.

23 Q Okay. And do you recall the time period
24 that they were a customer?

1 A They were there when I was there.

2 Q So, the entire time that you worked out
3 there, they were a customer?

4 A Yes, they were.

5 Q Okay. Any other generators?

6 A I know a lot of generators. I just can't
7 think of their names.

8 Q So, if I read you some names of
9 companies --

10 A If you read me, I could tell you.

11 Q You may recognize them?

12 A Right.

13 Q Okay. How about A. E. Staley, or Staley?

14 A A. E. Staley. I don't think we hauled for
15 A. E. Staley. I remember -- I don't think we went
16 down that far. I think they were located down there
17 in Decatur.

18 Q Do you recall a facility in Lemont?

19 A Yeah, that's right. There's an A. E.
20 Staley in Lemont, that's right.

21 Q But you don't recall hauling for them?

22 A Yeah, I imagine we did. See, there were so
23 many Staleys, and I worked for so many companies now
24 with waste.

1 Q I understand, Mr. Thompson, that because
2 you've been in the industry so long, you've worked
3 with a lot of companies. And it's possible that
4 U.S. Scrap may have hauled for some of these
5 companies, and you just don't recall. Feel free to
6 tell me that. I'm not asking you to recall things
7 that you just don't recall.

8 So, A. E. Staley, U.S. Scrap might have
9 hauled for, you just don't recall, is that correct?

10 A That's correct.

11 Q How about Abbott Laboratories?

12 A No, I don't remember.

13 Q You don't recall?

14 A No, I don't.

15 Q Active Services Company?

16 A No.

17 Q Would it help you if I gave you some
18 facility addresses, generator addresses?

19 A Yeah, you could do that.

20 Q Okay. How about Adolph Plating?

21 A Are they located on 79th Street, somewhere
22 around there?

23 Q I don't know the address for them.

24 A No.

1 Q Okay. You don't recall?

2 A No.

3 Q Alberto Culver?

4 A Yes. We hauled for them. They're on North
5 Avenue or someplace?

6 Q Close. Armitage Avenue in Melrose Park.

7 A Around Melrose Park, right.

8 Q Do you recall what kind of waste they
9 generated?

10 A Yeah. It smelled pretty. Soap, probably,
11 mostly. Alberto for your hair and stuff.

12 Q Do you recall the amount that was picked up
13 there?

14 A Mostly everything we hauled was 5,000,
15 because that was legal.

16 Q Do you recall how often you'd pick up from
17 there?

18 A No.

19 Q How about a company called Alton Boxboard
20 Company?

21 A Yes, we did. Are they over there in
22 Chicago off of --

23 Q This says West 65th Street in Bedford Park?

24 A Bedford Park, right.

1 Q That's the facility you recall?

2 A Right.

3 Q And do you recall what kind of waste they
4 generated?

5 A It's like paste water, blue.

6 Q And do you recall --

7 A No, like I said. It's -- we all -- mostly
8 everything was four, 5,000 gallons. The majority
9 was 5,000 gallons, everything we hauled.

10 Q Was there any kind of distinction made
11 between companies that provided their waste in drums
12 and those that provided it in bulk tanker?

13 A They'd have either a tank on site that we'd
14 pump, or else we could pump drums, too.

15 Q Did some have both tanks and drums?

16 A Yes.

17 Q Do you recall how often you would pick up
18 from Alton Boxboard?

19 A No.

20 Q Any information you can give me regarding
21 quantity or amounts that were generated is helpful,
22 Mr. Thompson. Even if you -- if all you know is
23 that they were a big account or a small account or a
24 one-time account, tell me that. Okay?

1 A Okay.

2 Q And if you don't recall, also tell me that.
3 But any information you can provide is helpful.

4 Do you recall American Can being a
5 generator, American Can Company?

6 A Yes.

7 Q Okay. Do you recall where those facilities
8 or facility were?

9 A Hammond.

10 Q Do you recall a facility in Maywood?

11 A Yes.

12 Q Okay. Mr. Martel told us that the Maywood
13 facility was a generator until there was an
14 explosion there. Do you recall that?

15 A No.

16 Q Okay. How about a facility on Northwest
17 Highway in Barrington?

18 A Yeah, we picked up there.

19 Q And how about a facility at 6017 South
20 Western in Chicago?

21 A Right.

22 Q Okay. You recall that one, too?

23 A Yes.

24 Q All right. Do you recall what kind of

1 waste these companies generated, these facilities?

2 A Water and oil for tin cans.

3 Q All right. And do you recall the amounts?

4 A Like I said, I don't remember the amounts.

5 All I remember is that we pick up 5,000 gallons.

6 Q Do you recall American Can being a big
7 client or a small client?

8 A No, it wasn't too big.

9 Q I'm sorry?

10 A No, I don't recall.

11 Q You don't recall? Okay. Do you recall
12 American Motor Company in Kenosha, Wisconsin being a
13 generator?

14 A No.

15 Q How about American Printers in Niles, on
16 Oakton?

17 A Yes.

18 Q And do you recall what kind of waste they
19 generated?

20 A Probably ink.

21 Q Do you recall how much was picked up there?

22 A No, no.

23 Q Do you recall whether they were a big or
24 small client?

1 A I don't remember.

2 Q Do you recall a company called Apco or
3 Apeco, located at 2100 Dempster in Evanston?

4 A No.

5 Q How about a company called Armour or Wilson
6 & Company, located at 41st and Paulina in Chicago?

7 A No.

8 Q How about a company called Armstrong Paint
9 or Elliott Paint?

10 A Yes.

11 Q Okay. Do you recall where they were
12 located?

13 A Off Ashland Avenue?

14 Q Would that be 1330 South Kilbourn in
15 Chicago?

16 A Yeah.

17 Q Do you recall that?

18 A Yes.

19 Q And do you recall what kind of waste they
20 generated?

21 A Paint.

22 Q When you say paint, would it be --

23 A Solvent, paint.

24 Q Okay. And do you recall how much they

1 generated?

2 A No.

3 Q Did they -- were they a customer the entire
4 time you worked at U.S. scrap?

5 A Yes.

6 Q Do you recall Ashland Chemical Company
7 being a generator?

8 A Oh, yes.

9 Q Do you recall where their facility is
10 located?

11 A I think right over there in Dolton, right
12 over there by Dolton over there. I think they're
13 out of business now. They used to be -- also, they
14 had another place down there in -- off of 55.

15 Q Do you recall what --

16 A In Lemont.

17 Q In Lemont?

18 A Right.

19 Q Did you pick up from that facility as well?

20 A Yes. Because you couldn't get in one way.
21 You know, there was only one way to get around and
22 get in there.

23 Q And do you recall what kind of waste they
24 generated?

1 A No.

2 Q Do you recall how frequently they disposed
3 of waste?

4 A No.

5 Q Do you recall whether they were a big or a
6 small account?

7 A They were a big account.

8 Q How about Barber-Green Company in Aurora,
9 Illinois?

10 A No.

11 Q Bagcraft Corporation?

12 A (No audible response.)

13 Q No?

14 A No.

15 Q Barker Chemical?

16 A Yes.

17 Q Do you recall where they were located?

18 A In Riverdale.

19 Q Is it about 138th Street?

20 A Right. That's -- right now, it's -- Safe
21 Clean bought the facility out.

22 Q Do you recall what kind of waste they
23 generated?

24 A Solvent, paint.

1 Q And were they a big or a small customer?

2 A Big.

3 Q And did they remain a customer the entire
4 time you were out there?

5 A Yes.

6 Q Do you recall Barrett Varnish Company?

7 A Yes.

8 Q And do you recall where they were located?

9 A No. If you said the address, I might
10 remember.

11 Q Does South 50th Court in Cicero, Illinois
12 sound familiar?

13 A Yeah.

14 Q And do you recall what kind of waste they
15 generated?

16 A No.

17 Q Do you recall whether they were a big or a
18 small customer?

19 A (No audible response.)

20 Q No?

21 A No.

22 Q And were they a customer the entire time
23 you were at U.S. Scrap?

24 A Yeah, yes.

1 Q Do you recall Benjamin Moore Company being
2 a customer?

3 A Yes.

4 Q And do you recall where their facility was
5 located?

6 A In Melrose Park.

7 Q And was that North and 25th Avenues?

8 A Yes.

9 Q And do you recall what kind of waste they
10 generated?

11 A Paint solvents.

12 Q Were they a big or a small customer?

13 A It was a big company, big account.

14 Q And they were a customer the entire time
15 you were at U.S. Scrap?

16 A Yes.

17 Q Just so we can speed things up,
18 Mr. Thompson, and I can get you out of here as soon
19 as possible, I'll just ask you if they were a big or
20 a small customer. If you recall any details
21 regarding the size of the loads or frequency of the
22 loads other than that they were 5,000-gallon loads,
23 let me know. Okay?

24 A Okay.

1 Q Do you recall Big Ben Chemicals?

2 A No.

3 Q Blaw-Knox Foundry?

4 A No.

5 Q In East Chicago?

6 A No.

7 Q Boyle Midway?

8 A Yes.

9 Q Do you recall where they were located?

10 A No, I don't think so.

11 Q Do you recall what kind of waste they
12 generated?

13 A No.

14 Q And do you recall whether they were a big
15 or a small customer?

16 A No.

17 Q Were they a customer the entire time you
18 were at U.S. Scrap?

19 A I think so.

20 Q Do you recall Brandenburg Wrecking Company?

21 A I heard of it, yes.

22 Q Do you recall whether they were a customer?

23 A No. I think they were -- weren't they the
24 ones that brought the stuff in to us? They tore up

1 houses and everything, and then they dumped into
2 our --

3 Q So, if I understand correctly, they would
4 bring construction debris and dump it onsite?

5 A Right.

6 Q How about a company called Brett Ford
7 Manufacturing in Schiller Park?

8 A No, I don't recall.

9 Q Don't recall?

10 A No.

11 Q A company called Brightly Galvanized?

12 A Yes. They're on Cicero and -- by the
13 racetrack there, 22nd, something like that.

14 Q On Cicero in Cicero?

15 A No. On Cicero Avenue. Well, actually, you
16 know, the plant is right off of Cicero, on Cicero
17 Avenue, right by the racetrack there. And they haul
18 acid. We hauled a lot of acid out of there.

19 Q Were they a big or a small account?

20 A Big account.

21 Q And were they a customer the entire time
22 you were at U.S. Scrap?

23 A Yes.

24 Q How about a company called Boltmaster?

1 A Boltmaster, I heard of it, I think so.

2 Q And do you recall where they were located?

3 A No.

4 Q Do you recall what kind of waste they
5 generated?

6 A No.

7 Q And were they a customer the entire time
8 you were at U.S. Scrap?

9 A Yes.

10 Q Do you recall a company called C. P. Clare?

11 A Yes.

12 Q Do you recall where they were located?

13 A No.

14 Q Do you recall whether it was 3101 West
15 Pratt Boulevard in Chicago?

16 A That could be correct.

17 Q You just don't recall?

18 A Just don't recall.

19 Q Do you recall what kind of waste they
20 generated?

21 A No.

22 Q And were they a customer the entire time
23 you were at U.S. Scrap?

24 A Yes.

1 Q Do you recall a company called C. P. Hall?

2 A Right.

3 Q And do you recall where they were located?

4 A No. I think we hauled drums for him.

5 Q Do you recall what waste was in the drums?

6 A No.

7 Q Were they a small or a big customer?

8 A They were steady on them, pretty big.

9 Q And were they a customer the entire time
10 you were at U.S. scrap?

11 A Yes.

12 Q Do you recall a company called Cargill,
13 Incorporated?

14 A Yes.

15 Q And do you recall where they were located?

16 A Yeah. They're on -- off of Torrence.

17 Q I have Cottage Avenue and Lake Marion Road
18 in Carpentersville.

19 A Right.

20 Q Do you recall what kind of waste they
21 hauled?

22 A No, I don't.

23 Q Do you recall whether they were a big or a
24 small account?

1 A They were pretty big.

2 Q And were they a customer the entire time
3 you were at U.S. Scrap?

4 A Yes.

5 Q Do you recall a company called Central Can
6 Company?

7 A Yes.

8 Q Do you recall where they were located?

9 A No.

10 Q Do you recall what kind of waste they
11 generated?

12 A No.

13 Q Do you recall if they were a big or a small
14 account?

15 A No, I don't remember.

16 Q Okay. Were they a customer the entire time
17 you were at U.S. Scrap?

18 A Yes.

19 Q Do you recall a company called Central
20 Solvents & Chemicals?

21 A Yes.

22 Q And do you recall where they were located?

23 A No.

24 Q Do you recall what kind of waste they

1 generated?

2 A I imagine solvent, but I don't remember.

3 Q Do you recall if they were a big or a small
4 account?

5 A No, I don't.

6 Q And do you recall whether they were a
7 customer the entire time you were at U.S. Scrap?

8 A Yes, they were.

9 Q Okay. Do you recall a company called Chase
10 Products or Chase Brass?

11 A No, I don't remember them.

12 Q Do you recall a company called Chicago
13 Decal?

14 A Yes.

15 Q Do you recall where they were located?

16 A No.

17 Q Do you recall if it was 3310 North Elston
18 in Chicago?

19 A Yeah, that could be them.

20 Q Okay. Do you recall what kind of waste
21 they generated?

22 A No.

23 Q Do you recall whether they were a big or
24 small customer?

1 A No, I don't remember.

2 Q Were they a customer the entire time you
3 were at U.S. Scrap?

4 A Yes.

5 Q Do you recall Chicago Name Plate?

6 A Yes.

7 Q And do you recall where they were located?

8 A No.

9 Q Do you recall what kind of waste they
10 generated?

11 A No.

12 Q Do you recall whether they were a big or
13 small customer?

14 A I don't remember.

15 Q Okay. Were they a customer the entire time
16 you were at U.S. Scrap?

17 A Yes.

18 Q Was the Chicago Northwestern Railroad a
19 customer?

20 A Yes.

21 Q Do you recall where their facility was
22 located?

23 A Northlake?

24 Q Okay. Northlake?

1 A Yes.

2 Q Was it a switching yard?

3 A Right. Diesel, we haul out of there.

4 Q Diesel oil, diesel fuel?

5 A Right. Big, big account.

6 Q Big account? And they were a customer the
7 entire time you were at U.S. Scrap?

8 A Yes.

9 Q Do you recall Chicago Steel & Wire being a
10 customer?

11 A Yes.

12 Q And do you recall where they were located?

13 A Torrence Avenue.

14 Q And do you recall what kind of waste they
15 generated?

16 A That's acid water.

17 Q And were they a big or a small account?

18 A We'd haul every week out of there, steady.

19 Q Every week, four or 5,000 gallons?

20 A Right.

21 Q And they were a customer the entire time
22 you were at U.S. Scrap?

23 A Yes.

24 Q Do you recall Chicago Rawhide being a

1 customer?

2 A Yes.

3 Q Do you recall where they were located?

4 A It used to be the stockyards there, around
5 Morton Street, around there, off of 39th, in the
6 stockyard.

7 Q Okay. Was Chicago Sheepskin also a
8 customer?

9 A Right.

10 Q Okay. Going back to Chicago Rawhide, do
11 you recall what kind of waste they generated?

12 A Yeah. That's -- they call it cow stuff,
13 water, and it stunk real bad.

14 MR. KOWALSKI: Off the record.

15 (Discussion held off the record.)

16 MR. KOWALSKI: Okay. Back on the record.

17 BY MR. KOWALSKI:

18 Q And were they a customer the entire time
19 you were at U.S. Scrap?

20 A Yes.

21 Q Do you recall a customer called
22 Chrome-Rite?

23 A Yes.

24 Q And do you recall where they were located?

1 A No, not offhand.

2 Q Do you recall what kind of waste they
3 generated?

4 A No.

5 Q Do you recall whether they were a customer
6 the entire time you were at U.S. Scrap?

7 A Yes.

8 MR. KOWALSKI: Okay. Let's take a short break
9 here.

10 (Recess had.)

11 MR. KOWALSKI: Back on the record.

12 BY MR. KOWALSKI:

13 Q Mr. Thompson, you were trying to recall an
14 individual's name earlier that Mr. Martel sold the
15 U.S. Scrap customer list to. Was that man's name
16 John Josephic?

17 A Yes, it was. I went to work for him.

18 Q Okay. Getting back to generators' waste
19 that was disposed of at U.S. Scrap, do you recall
20 Chicago Rotoprint being a customer?

21 A Yes, I do.

22 Q Do you recall where they were located?

23 A No.

24 Q Does 4601 West Belmont in Chicago sound

1 familiar?

2 A Yeah.

3 Q Do you recall what kind of waste they
4 generated?

5 A No.

6 Q And do you recall whether they were a big
7 or a small customer?

8 A No, I don't.

9 Q Were they a customer the entire time you
10 were at U.S. Scrap?

11 A Yes.

12 Q And you mentioned earlier that you recall
13 Chicago Sheepskin being a customer?

14 A Yes.

15 Q Was that the facility located at 4000 South
16 Packers, in Chicago?

17 A Right. That's just the old stockyard. I
18 think everyone's torn down there. I don't think
19 they're in business anymore.

20 Q Do you recall the nature of their waste?

21 A Yes.

22 Q And what was that?

23 A Cow piss.

24 Q Okay. And do you recall whether they were

1 a small or a large customer?

2 A They were pretty large. I think we hauled
3 every week out of there, usually. I think we had a
4 tank stored there, and we used to pump it out.

5 Q And they were a customer the entire time
6 you were at U.S. Scrap?

7 A Yes.

8 Q Do you recall Clark Equipment being a
9 customer?

10 A Right.

11 Q And do you recall where they were located?

12 A Off Cicero there in Bedford Park, is it?

13 Q I have 601 North Farnsworth in Aurora.

14 A Yes.

15 Q And that was a plant where you'd pick up
16 from?

17 A Yeah, in Aurora, right. We had a tank
18 there.

19 Q You had a tank?

20 A Yeah, we had a tank there. What was it?
21 That was a split-axle tank. And it was black, I
22 remember that. And it would hold 6,000 gallons.

23 Q Do you recall what kind of waste they
24 generated?

1 A Yeah, oil.

2 Q And do you recall whether they were a large
3 or a small customer?

4 A They were pretty large.

5 Q And were they a customer the entire time
6 you were at U.S. Scrap?

7 A Yes.

8 Q Do you recall Clark Oil & Refining Company
9 being a customer?

10 A Yes.

11 Q Do you recall where they were located?

12 A They were located at 135th and -- off of
13 Kedzie.

14 Q In Blue Island?

15 A Blue Island. That's it.

16 Q And do you recall what kind of waste they
17 generated?

18 A Yeah. We hauled waste diesel, oil.

19 Q And were they a large or a small account?

20 A Large.

21 Q And were they a customer the entire time
22 you were at U.S. Scrap?

23 A Yes.

24 Q Do you recall Coldwell or Coldwell General

1 being a customer?

2 A Yes, I think so.

3 Q And do you recall where they were located?

4 A No.

5 Q Do you recall what kind of waste they
6 generated?

7 A No.

8 Q Do you recall whether they were a large or
9 a small customer?

10 A No.

11 Q Do you recall whether they were a customer
12 the entire time you were at U.S. Scrap?

13 A Yes.

14 Q They were?

15 A They were.

16 Q Do you recall Commander Packaging being a
17 customer?

18 A Yes.

19 Q And do you recall where they were located?

20 A I think they were on 115th Street over
21 there, off the expressway, Stoney Island.

22 Q I have 4925 Indiana Avenue in Lisle,
23 Illinois.

24 A Lisle?

1 Q Does that sound familiar?

2 A Yes.

3 Q Do you recall what kind of waste they
4 generated?

5 A Yes. It's a water waste, paste-like.

6 Q And do you recall whether they were a large
7 or a small account?

8 A No.

9 Q Were they a customer the entire time you
10 were at U.S. Scrap?

11 A Yes.

12 Q Because we're repeating here, you know what
13 I'm going to say before I say it, but you have to
14 let me finish before you answer.

15 A Oh, okay, right.

16 Q Do you recall Container Corporation being a
17 customer?

18 A Yes.

19 Q Do you recall where they were located?

20 A 65th Street is all I remember, somewhere
21 around there, 65th.

22 Q Do you recall a facility at 400 East North
23 Avenue in Carol Stream?

24 A No.

1 Q Okay. Do you recall what kind of waste
2 they generated?

3 A No.

4 Q And do you recall whether they were a large
5 or small account?

6 A They were pretty large, I remember. But I
7 don't remember what the liquid is, though. It's
8 been so long.

9 Q Were they a customer the entire time?

10 A Yes.

11 Q Do you recall Collis Company, located in
12 Clinton, Iowa?

13 A Yes.

14 Q Do you recall what kind of waste they
15 generated?

16 A No, I don't remember what the liquid was.

17 Q Do you recall whether it was acid?

18 A Yeah, it could be acid, maybe. Because I
19 think they're -- they make stuff for ovens that
20 you -- the grill things that you put on a -- or even
21 in the refrigerators, that grill like we used to
22 have. You know, it's made of silver.

23 Q Oh, I see. Were they a large or a small
24 account?

1 A We hauled pretty steady out of there.

2 Q And were they a customer the entire time
3 you were at U.S. Scrap?

4 A Yes.

5 Q Do you recall Continental Can Company being
6 a customer?

7 A Yes.

8 Q And do you recall where they were located?

9 A I think we had one on 65th in Bedford Park.
10 They had one there.

11 Q I have facilities listed on 65th in Bedford
12 Park, on Major Avenue in Chicago.

13 A Yes.

14 Q And a plant in Milwaukee, Wisconsin.

15 A Yes.

16 Q Okay. Do you recall all three of those?

17 A Yes.

18 Q Do you recall what kind of waste they
19 generated?

20 A Oil and water.

21 Q Do you recall, did the different plants
22 generate similar wastes, or was it different wastes?

23 A Yes. Well, it's tin cans. They make tin
24 cans there, and we'd haul their waste.

1 Q Were they a small or a large account?

2 A Large.

3 Q And were they a customer the entire time
4 you were at U.S. Scrap?

5 A Yes.

6 Q Do you recall Corn Products Company being a
7 customer?

8 A Yes.

9 Q And do you recall where they were located?

10 A Summit.

11 Q Okay. I have Argo, Illinois.

12 A Yeah, Argo. That's Summit, right by Argo,
13 Summit.

14 Q Okay. And do you recall what kind of waste
15 they generated?

16 A No, I don't recall.

17 Q Do you recall whether they were a large or
18 a small account?

19 A No, I don't remember.

20 Q And were they a customer the entire time
21 you were at U.S. Scrap?

22 A Yes.

23 Q Do you recall a company called Cosden Oil
24 being a customer?

1 A No.

2 Q Do you recall a company called Crescent
3 Company?

4 A No.

5 Q Do you recall a customer called Crown Cork
6 and Seal?

7 A Yes.

8 Q Do you recall where they were located?

9 A 43rd Street?

10 Q 31st Street in Chicago?

11 A 31st, right.

12 Q And do you recall what kind of waste they
13 generated?

14 A Solvent.

15 Q Were they a large or a small customer?

16 A They were large.

17 Q And do you recall them being a customer the
18 entire time you were at U.S. Scrap?

19 A Yes.

20 Q Do you recall Culligan Company being a
21 customer?

22 A Yes.

23 Q And do you recall where they were located?

24 A No.

1 Q Do you recall whether it was Northbrook,
2 Illinois?

3 A Yes, that's where.

4 Q Do you recall what kind of waste they
5 generated?

6 A No.

7 Q And were they a large or a small customer?

8 A I think they're pretty large.

9 Q Were they a customer the entire time you
10 were at U.S. Scrap?

11 A Yes.

12 Q Do you recall a customer called Cuneo
13 Press, C-u-n-e-o?

14 A No.

15 Q Do you recall a customer called Custom
16 Organics?

17 A Yes.

18 Q Do you recall where they were located?

19 A Yes. They were on the stockyard right
20 there off of Ashland Avenue and 41st Street.

21 Q Okay. Do you recall what kind of waste
22 they generated?

23 A Yes. We hauled solvents out of there. We
24 hauled -- they were quite a big customer. We hauled

1 quite a bit of stuff out of there.

2 Q Do you recall what else other than
3 solvents?

4 A I imagine oil and water.

5 Q And they were a customer the entire time
6 you were at U.S. Scrap?

7 A Yes.

8 Q Do you recall a customer called Danley
9 Machine Company?

10 A No.

11 Q Do you recall a customer called Dap,
12 Incorporated?

13 A No.

14 Q Or Dap Ink?

15 A Yeah. I remember that. But I don't
16 remember anything about it, but I remember in the
17 paper that we picked up.

18 Q You recall on the ledger sheets that they
19 were a customer?

20 A Yes.

21 Q Do you recall what kind of waste they
22 generated?

23 A No.

24 Q Do you recall where their facility was

1 located?

2 A No.

3 Q Were they a customer the entire time you
4 were at U.S. Scrap?

5 A Yes.

6 Q Do you recall a customer called Daubert
7 Chemical?

8 A No.

9 Q Do you recall a customer called Demert &
10 Dougherty?

11 A Yes.

12 Q Do you recall where they were located?

13 A No.

14 Q Does 5,000 West 41st Avenue in Cicero sound
15 familiar?

16 A No.

17 Q Do you recall what kind of waste they
18 generated?

19 A No.

20 Q Do you recall whether they were a large or
21 a small company?

22 A No.

23 Q Were they a customer the entire time you
24 were at U.S. Scrap?

1 A I guess. I don't remember.

2 Q If you don't remember, please let me know
3 that.

4 Do you recall a customer called DeSoto
5 Chemical?

6 A Yes.

7 Q And do you recall where they were located?

8 A Chicago Heights?

9 Q And do you recall what kind of waste they
10 generated?

11 A Yeah, solvents.

12 Q And were they a large or small account?

13 A Large.

14 Q And they were a customer the entire time
15 you were at U.S. Scrap?

16 A Yes.

17 Q And do you recall a company being a
18 customer called Dupont?

19 A Yes.

20 Q And do you recall where their facility was?

21 A East Chicago?

22 Q I have 2100 North Elston in Chicago.

23 A Yes.

24 Q Do you recall --

Du Pont

1 A We've got one in East Chicago, too.

2 Q Did you pick up from one in East Chicago,
3 too?

4 A Yeah.

5 Q Do you recall what kind of waste they
6 generated?

7 A It was paint solvent.

8 Q And do you recall whether they were a large
9 or a small account?

10 A No, I don't remember that.

11 Q Were they a customer the entire time you
12 were at U.S. Scrap?

13 A Yes.

14 Q Do you recall a customer called Echo
15 Products?

16 A Yes.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall what they generated?

20 A No.

21 Q Do you recall whether they were a large or
22 a small account?

23 A No.

24 Q Were they a customer the entire time you

1 were at U.S. scrap?

2 A Yes.

3 Q Do you recall a company called Electronic
4 Plating Company?

5 A Yes.

6 Q Do you recall where they were located?

7 A No.

8 Q Do you recall what kind of waste they
9 generated?

10 A No.

11 Q Do you recall whether they were a large or
12 a small account?

13 A No, I don't remember.

14 Q Okay. Were they a customer the entire time
15 you were at U.S. Scrap?

16 A Yes.

17 Q Do you recall a customer called Elliott
18 Paint?

19 A Yes.

20 Q Do you recall where they were located?

21 A Not offhand.

22 Q Do you recall what kind of waste they
23 generated?

24 A I can't say, because I don't remember.

1 Q Do you recall if they were a large or a
2 small account?

3 A No, I don't remember.

4 Q Do you recall if they were a customer the
5 entire time you were at U.S. Scrap?

6 A Yes.

7 Q Yes, they were?

8 A Yes.

9 Q Do you recall a customer called Englander
10 Mattress Company?

11 A No.

12 Q Do you recall a customer called Enterprise
13 Paint?

14 A Yes.

15 Q Do you recall where they were located?

16 A Ashland? 21st?

17 Q 28th and Ashland?

18 A Yes. 28th and Ashland, that's right.

19 Q Do you recall what kind of waste they
20 generated?

21 A Yes, paint.

22 Q And were they a large or a small account?

23 A Large.

24 Q And they were a customer the entire time

1 you were at U.S. Scrap?

2 A Yes.

3 Q Do you recall a company called Enterprise
4 Wire Company?

5 A Yes.

6 Q Do you recall where they were located?

7 A Blue Island.

8 Q Do you recall what kind of waste they
9 generated?

10 A Acids.

11 Q And were they a large or a small account?

12 A Large.

13 Q And were they a customer the entire time
14 you were at U.S. Scrap?

15 A Yes.

16 Q Do you recall a customer called Felt
17 Products Manufacturing?

18 A No.

19 Q Do you recall a customer called Fiber Bond?

20 A Yes.

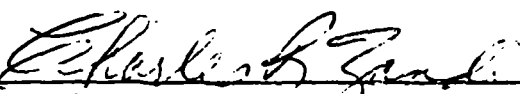
21 Q Do you recall where they were located?

22 A No.

23 Q Do you recall what kind of waste they
24 generated?

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1 Q Do you recall a customer called Frederick
2 H. Levey Ink Company?

3 A No.

4 Q Do you recall a customer called Fox Valley
5 Manufacturing?

6 A Yes.

7 Q Do you recall where they were located?

8 A In Aurora.

9 Q Elgin?

10 A Yeah.

11 Q And do you recall what kind of waste they
12 produced?

13 A I imagine oil and water -- or mostly water,
14 I think it is.

15 Q And were they a large or a small account?

16 A I don't remember.

17 Q Do you recall if they were a customer the
18 entire time you were at U.S. Scrap?

19 A Yes. Scratch that oil. I mean, it wasn't
20 oil; it was water, some kind of water stuff that we
21 hauled out of there.

22 Q Some waste mixed with water?

23 A Yeah, right.

24 Q You don't know the nature of the waste that

1 was mixed with it?

2 A No.

3 Q And they were a customer the entire time
4 you were at U.S. Scrap?

5 A Yes.

6 Q Do you recall a customer called Furnas
7 Electric?

8 A No, I don't remember.

9 Q Do you recall a customer called Georgia
10 Pacific Company?

11 A Yes.

12 Q Do you recall where they were located?

13 A Not offhand, no.

14 Q Do you recall what kind of waste they
15 generated?

16 A No.

17 Q Do you recall if they were a large or a
18 small account?

19 A They were a large account. I can't
20 remember what -- what was the waste that we hauled
21 for them.

22 Q Were they a customer the entire time you
23 were at U.S. Scrap?

24 A Yes.

1 Q Do you recall a customer called Glidden
2 Paint Company?

3 A Yes.

4 Q Do you recall where they were locate

5 A I can't remember offhand, but I remember -
6 pretty good.

7 Q Okay. Would it be 1800 North LeClaire in
8 Chicago?

9 A Yeah, that's right. That's where it's at.

10 Q And do you recall what kind of waste they
11 generated?

12 A Yeah, paints, solvents.

13 Q And were they a large or a small account?

14 A I would say it's -- yes.

15 Q Large?

16 A They were large.

17 Q And were they a customer the entire time
18 you were at U.S. Scrap?

19 A Yes.

20 Q Do you recall Good Humor Company being a
21 customer?

22 A Yes.

23 Q Did they generate any waste other than food
24 waste?

Glidden

1 A It was -- everything melted, the chocolate
2 with the water, and it just fermented, like. You
3 know, it was terrible.

4 Q Was there a chemical waste they generated?

5 A No. It was a food product deal.

6 Q Okay. Do you recall a customer called
7 Graftec Press?

8 A Yes.

9 Q Do you recall where they were?

10 A I know where they're at, but I don't
11 remember.

12 Q Do you recall what kind of waste they
13 generated?

14 A No.

15 Q Do you recall whether they were a large or
16 a small customer?

17 A No.

18 Q Were they a customer the entire time you
19 worked at U.S. Scrap?

20 A Yes.

21 Q Do you recall a customer called Graphon,
22 Incorporated?

23 A Yes.

24 Q Do you recall where they were located?

1 A No.

2 Q Does Franklin Park refresh your
3 recollection?

4 A Yes.

5 Q Do you recall what kind of waste they
6 generated?

7 A No.

8 Q Do you recall if they were a large or a
9 small account?

10 A No.

11 Q Were they a customer the entire time you
12 were at U.S. Scrap?

13 A Yes.

14 Q Do you recall a customer called W. F. Hall
15 Printing Company?

16 A Yes.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall whether it was 4600 West
20 Diversey in Chicago?

21 A Yes, I do.

22 Q Do you recall what kind of waste they
23 generated?

24 A No.

1 Q Do you recall if they were a large or a
2 small account?

3 A I don't remember.

4 Q And were they a customer the entire time
5 you were at U.S. Scrap?

6 A Yes.

7 Q Do you recall a customer called Hanna
8 Waterways?

9 A Yes.

10 Q And do you recall where they were located?

11 A Lockport?

12 Q Lemont?

13 A Lemont, yeah.

14 Q Okay. And do you recall what kind of waste
15 they generated?

16 A Water with some other chemical in it.

17 Q You don't know what other chemical?

18 A No.

19 Q And were they a large or a small account?

20 A I don't remember.

21 Q Were they a customer the entire time you
22 were at U.S. Scrap?

23 A Yes.

24 Q Do you recall a customer called Hendrickson

1 Manufacturing?

2 A No.

3 Q Do you recall a customer called Heritage
4 Ink?

5 A No.

6 Q Do you recall a customer called Hills
7 McCanna?

8 A Yes.

9 Q Do you recall where they were located?

10 A No.

11 Q Do you recall what kind of waste they
12 generated?

13 A No.

14 Q Do you recall whether they were a large or
15 a small account?

16 A I don't remember.

17 Q Were they a customer the entire time you
18 were at U.S. Scrap?

19 A Yes.

20 Q Do you recall a company called Hodson
21 Corporation?

22 A No.

23 Q Do you recall whether E. F. Houghton was a
24 customer?

1 A I heard the name, but I don't remember
2 anything.

3 Q Okay. Do you recall a customer called
4 Hoener-Waldorf?

5 A No.

6 Q Do you recall General Electric or Hotpoint
7 Division of General Electric being a customer?

8 A Yes.

9 Q And where were they located?

10 A 16th off of Cicero, 16th Street.

11 Q In Cicero, Illinois?

12 A Cicero.

13 Q Do you recall what kind of waste they
14 generated?

15 A Oil, water.

16 Q Okay. And do you recall whether they were
17 a large or a small account?

18 A Large.

19 Q And were they a customer the entire time
20 you were at U.S. Scrap?

21 A Yes.

22 Q Do you recall a customer called Howell
23 Company?

24 A Yes.

1 Q And do you recall where they were located?

2 A St. Charles?

3 Q And do you recall what kind of waste they
4 generated?

5 A That's acid water.

6 Q And were they a large or a small account?

7 A Large.

8 Q And were they a customer the entire time
9 you were at U.S. Scrap?

10 A Yes.

11 Q Do you recall Hunt & Wesson being a
12 customer?

13 A Yes.

14 Q Do you recall where they were located?

15 A 37th Street, Cicero -- Chicago?

16 Q Do you recall what kind of waste they
17 generated?

18 A No.

19 Q And do you recall whether they were a large
20 or a small account?

21 A I don't remember.

22 Q And were they a customer the entire time
23 you were at U.S. Scrap?

24 A Yes.

1 Q Do you recall International Minerals &
2 Chemicals being a customer?

3 A Yes.

4 Q Where were they located?

5 A I don't remember. I just remember the name
6 that we had on there. You know, it's been a long
7 time, so I can't remember. Some I do, and some I
8 don't.

9 Q Sure. And please tell me that.
10 Do you recall whether or not they were in
11 Carpentersville?

12 A It could be. I don't remember offhand.

13 Q Okay. Do you recall what kind of waste
14 they generated?

15 A No.

16 Q Do you recall whether they were a large or
17 a small account?

18 A No, I don't remember.

19 Q Do you recall whether they were a customer
20 the entire time you were at U.S. Scrap?

21 A Yes. It was on the board.

22 Q Okay. When you say, "Yes. It was on the
23 board," that means it was on your list of customers?

24 A Yeah, on the sheet, right.

1 Q Do you recall ITT Harper Corporation being
2 a customer?

3 A Yes.

4 Q Do you recall where they were located?

5 A No.

6 Q Do you recall what kind of waste they
7 generated?

8 A No.

9 Q Do you recall whether they were a large or
10 a small account?

11 A I don't remember.

12 Q Do you recall if they were a customer the
13 entire time you were at U.S. Scrap?

14 A I don't remember.

15 Q Do you recall a customer called Illinois
16 Bronze Coatings?

17 A Yes.

18 Q Do you recall where they were located?

19 A Franklin Park? Was that one there?

20 Q I have a facility in Lake Zurich.

21 A Lake Zurich? Yeah, that's it. That's
22 where it's at.

23 Q And do you recall what kind of waste they
24 generated?

1 A We had a tank there. They had separate
2 compartments. I don't remember -- you couldn't mix
3 it, poisons with something else. You couldn't mix
4 the two.

5 Q Were they a large or a small account?

6 A We didn't haul them too often, so I'd say
7 small.

8 Q Okay. And were they a customer the entire
9 time you were at U.S. Scrap?

10 A Yes.

11 Q Do you recall a customer called Industrial
12 Hard Chrome?

13 A Yes.

14 Q Do you recall where they were located?

15 A Chicago, off of -- I think it's 5200 West.

16 Q I have 901 Greenleaf in Elk Grove Village.

17 A What's the name of the customer again?

18 Q Industrial Hard Chrome.

19 A Yeah, that's it.

20 Q Okay. Do you recall what kind of waste
21 they generated?

22 A No.

23 Q Do you recall whether they were a large or
24 a small customer?

1 A No.

2 Q Were they a customer the entire time you
3 were at U.S. Scrap?

4 A Yes.

5 Q Do you recall a customer called Institute
6 of Gas Technology?

7 A Yes.

8 Q Where were they located?

9 A 41st and Pulaski, somewhere around there?

10 Q I have 35th and Pulaski.

11 A Yes.

12 Q Do you recall what kind of waste they
13 generated?

14 A It was water and it looked like coke. That
15 was steady out of there. You know, water with the
16 gases that smelled terrible. Dirty water.

17 Q When you say it looked like coke, you mean
18 the soda pop?

19 A No. Like coal, coke.

20 Q Oh, like coke for coal production?

21 A Yeah, coke.

22 Q Were they a large or a small customer?

23 A Large. We had a tank there.

24 Q Okay.

1 A Which means that we had tanks stationary
2 there. We'd suck the tank out, and bring it to
3 Martel.

4 Q Were customers where Martel had tanks large
5 accounts?

6 A Yes. The majority was, yes.

7 Q Okay. And were they a customer the entire
8 time you were at U.S. Scrap?

9 A Yes.

10 Q Do you recall Interlake Steel Company being
11 a customer?

12 A Yes.

13 Q Do you recall where they were located?

14 A Riverdale.

15 Q Do you recall what kind of waste they
16 generated?

17 A We hauled all kinds of waste out of there.
18 Oil, water, acids.

19 Q Okay.

20 A Big.

21 Q Big account?

22 A Big, big, big account.

23 Q Okay. And was there a clean-up involving
24 an oil spill over there?

1 A Yes, right on the lake, right on the river,
2 what they call the river. It used to be Acme Steel
3 at the time.

4 Q Okay. And were they a customer the entire
5 time you were at U.S. Scrap?

6 A Yes.

7 Q Was International Harvester Company a
8 customer?

9 A Yes.

10 Q Where were they located?

11 A Like at 120th, in Chicago.

12 Q Okay. Is that known as the West Pullman
13 Works?

14 A Yes.

15 Q Do you recall what kind of waste they
16 generated?

17 A Acids and water.

18 Q Okay. And were they a large or a small
19 account?

20 A Large.

21 Q And were they a customer the entire time
22 you were at U.S. Scrap?

23 A Yes.

24 Q Do you recall a customer called

1 International Multi-Foods?

2 A Yes.

3 Q And do you recall where they were located?

4 A Melrose Park.

5 Q Do you recall what kind of waste they
6 generated?

7 A Stinky. Fuel -- I mean like stinky food
8 product. It stunk bad.

9 Q Do you recall any waste other than food
10 production waste from them?

11 A No.

12 Q Do you recall a customer called Illinois
13 Tool Works?

14 A Yes.

15 Q Do you recall where they were located?

16 A By Skokie, out that way. All I know is it
17 was north.

18 Q Okay. I have 8501 West Higgins Road.

19 A Higgins, yeah.

20 Q Do you recall what kind of waste they
21 generated?

22 A No.

23 Q Do you recall whether they were a large or
24 a small account?

1 A No, I don't remember.

2 Q And do you recall if they were a customer
3 the entire time you were at U.S. Scrap?

4 A Yes.

5 Q Do you recall a customer called J. H. Huber
6 Ink Company?

7 A Yes.

8 Q Do you recall where they were located?

9 A No.

10 Q Do you recall if it was First and Route 66
11 in McCook, Illinois?

12 A Yes.

13 Q And what kind of waste did they generate?

14 A I don't remember.

15 Q Do you recall whether they were a large or
16 a small account?

17 A I don't remember.

18 Q Were they a customer the entire time you
19 were at U.S. Scrap?

20 A Yes.

21 Q Do you recall a company called Jannette &
22 Company?

23 A Yes.

24 Q Okay. And do you recall where they were

1 located?

2 A 123rd in Chicago.

3 Q And do you recall what kind of waste they
4 generated?

5 A Acids.

6 Q Were they a large or a small account?

7 A I don't remember.

8 Q Were they a customer the entire time you
9 were at U.S. Scrap?

10 A Yes.

11 Q Do you recall a customer called Jett Dye
12 Castings?

13 A Yes.

14 Q Where were they located?

15 A Elk Grove.

16 Q Do you recall what kind of waste they
17 generated?

18 A No.

19 Q Do you recall whether they were a large or
20 a small account?

21 A I don't remember.

22 Q Were they a customer the entire time you
23 were at U.S. Scrap?

24 A Yes.

1 Q Do you recall a company called Jewel Paint
2 Company?

3 A I don't remember.

4 Q Do you recall a customer called Jones &
5 Cleary Roofing Company?

6 A No.

7 Q Do you recall Kitchens of Sara Lee being a
8 customer?

9 A Yes.

10 Q Do you recall any waste from there other
11 than food waste?

12 A No. It was terrible waste. They're on the
13 way North Side.

14 Q In Deerfield?

15 A Yeah, Deerfield. And we hauled steady
16 there, big account.

17 Q Do you recall Lake River Terminals being a
18 customer?

19 A Yes.

20 Q Do you recall where they were located?

21 A No.

22 Q Do you recall what kind of waste they
23 generated?

24 A No.

1 Q Do you recall whether they were a large or
2 a small account?

3 A I don't remember, but I remember the name.
4 And a lot of these places I remember -- you know,
5 it's going back many years now. I remember the
6 names, but I can't remember offhand where they're
7 at. Some I do know, and some I don't.

8 Q That's fair. And that's all I ask you to
9 tell me.

10 Am I correct that you recall a lot of these
11 from seeing them on the customer list while you were
12 employed at U.S. Scrap?

13 A That is correct.

14 Q But exactly where they were located, you
15 don't recall?

16 A I don't remember offhand, which I'm pretty
17 good at that, because I'm a driver, and I remember a
18 lot of names. But it's going back many years now.

19 Q Okay. Just please tell me if you don't
20 recall. That's fine.

21 Do you recall LaSalle Management Company,
22 LaSalle National Bank being a customer?

23 A Yeah. Pretty sure.

24 Q Do you recall what kind of waste was picked

1 up from them?

2 A No.

3 Q Do you recall if they were a large or a
4 small customer?

5 A I don't remember. But I remember the name.

6 Q Do you recall whether Leavitt Tube Company
7 was a customer?

8 A Yes.

9 Q Do you recall where they were located?

10 A 117th in Chicago, right there off of
11 Vincennes.

12 Q Do you recall what kind of waste they
13 generated?

14 A Oil, water, acids.

15 Q And do you recall whether they were large
16 or small?

17 A Large.

18 Q Were they a customer the entire time you
19 were at U.S. Scrap?

20 A Yes.

21 Q Do you recall Libby MacNeal Libby being a
22 customer?

23 A Yes.

24 Q Where were they located?

1 A 115th and Ashland.

2 Q 119th and Ashland maybe?

3 A Yeah, 119th. It's one big plant, but we
4 hauled out of 119th.

5 Q Do you recall what kind of waste they
6 generated?

7 A Food products.

8 Q Do you recall whether they had any waste
9 that was non-food products?

10 A No. It was all food products we hauled out
11 of there.

12 Q Do you recall Lindblum High School being a
13 customer?

14 A Yes.

15 Q Do you recall where they were located?

16 A Chicago Heights.

17 Q What kind of waste did they generated?

18 A Oil, water, mostly oil.

19 Q Were they a large or a small account?

20 A I don't remember.

21 Q Were they a customer the entire time you
22 were at U.S. Scrap?

23 A Yes.

24 Q Do you recall a customer called Lawter

1 Chemical Company?

2 A No.

3 Q Do you recall a customer called
4 MacLean-Fogg Company?

5 A Yes.

6 Q Do you recall where they were located?

7 A I knew right where they're at. At 60 --
8 Route 60, and they make nuts and bolts there.

9 Q Would it be Mundelein, Illinois?

10 A Mundelein, that's correct.

11 Q Okay. Do you recall what kind of waste
12 they generated?

13 A A lot of oil.

14 Q Were they a large or a small account?

15 A Large.

16 Q And were they a customer the entire time
17 you were at U.S. Scrap?

18 A Yes.

19 Q Do you recall a company called Magee
20 Chemical?

21 A Yes.

22 Q Do you recall where they were located?

23 A No.

24 Q Does it refresh your recollection if I say

1 West Touhy in Des Plaines?

2 A Yes, that's it.

3 Q Okay. And do you recall what kind of waste
4 they generated?

5 A No, I don't remember.

6 Q Do you recall whether they were a large or
7 a small account?

8 A I don't remember.

9 Q And do you recall whether they were a
10 customer the entire time you were at U.S. Scrap?

11 A No, I don't remember.

12 Q Do you recall a customer called Marathon
13 Oil Company?

14 A Yes.

15 Q Where were they located?

16 A In Blue Island?

17 Q And do you recall what kind of waste they
18 generated?

19 A Oil.

20 Q Were they a large or a small account?

21 A Large.

22 Q And were they a customer the entire time
23 you were at U.S. Scrap?

24 A Yes.

1 Q Do you recall a customer called
2 Matherson-Selig?

3 A I don't remember.

4 Q Do you recall a customer called
5 McGraw-Edison?

6 A No, I don't remember.

7 Q Do you recall a customer called Midwest
8 Brass?

9 A Yes.

10 Q And where were they located?

11 A Franklin Park?

12 Q And do you recall what kind of waste they
13 generated?

14 A I can't remember offhand. I know exactly
15 what it is, but I can't -- all I know is they treat
16 it. I can't remember what the name of the product
17 is.

18 Q Was it acid?

19 A That's --

20 Q A form of acid?

21 A It's acids, but they've got another thing
22 for it that they did to treat the stuff. It's real
23 bad. I can't remember.

24 Q Okay. If you recall as we go along here,

1 just let me know.

2 Were they a large or a small account?

3 A I don't remember now.

4 Q Okay. And do you recall if they were a
5 customer the entire time you were at U.S. Scrap?

6 A Yes.

7 Q And they were?

8 A Yes, they were.

9 Q Do you recall Midwest Wrecking being a
10 customer?

11 A Midwest Wrecking was the ones that hauled
12 the garbage in to fill up the holes.

13 Q Do you recall what was in that garbage?

14 A Yeah, debris, from tearing buildings down
15 and stuff, bricks and --

16 Q Was there any liquid waste that they
17 generated?

18 A No.

19 Q Do you recall a customer called Mobil
20 Company?

21 A Yeah, Mobil. That one in Joliet.

22 Q Okay. I have one listed for Kankakee.

23 A Yes, yes, yes, yes. We hauled out of
24 there.

1 Q You recall --

2 A I remember. Right. But now I get the
3 name, it's by Bradley?

4 Q It could be. This says 901 North Greenwood
5 in Kankakee.

6 A Yeah.

7 Q Do you recall what kind of wastes they
8 generated?

9 A Solvents, paints.

10 Q And do you recall if they were a large or a
11 small account?

12 A Large.

13 Q And were they a customer the entire time
14 you were in U.S. Steel?

15 A Yes.

16 Q Do you recall a company called Monsanto?

17 A Yes.

18 Q And where were they located?

19 A Way west.

20 Q I have Muscatine, Iowa.

21 A Muscatine, Iowa. That's it. You're
22 correct.

23 Q And what kind of waste did they generate?

24 A Oh, that stuff was real bad. It would just

1 grab your breath. I don't know what it was.

2 Q Ammonia and solvents?

3 A Yes, that's it.

4 Q And were they a large account?

5 A A large account.

6 Q And were they a customer the entire time
7 you were at U.S. Scrap?

8 A Yes.

9 Q Do you recall a customer called Morton
10 Chemicals?

11 A Yes. They were a another one that had
12 ammonia in it. They were in Broadview or
13 Bridgeview.

14 Q Elk Grove Village?

15 A Elk Grove.

16 Q Were they a large or a small account?

17 A Large.

18 Q Were they a customer the entire time you
19 were at U.S. Scrap?

20 A Yes. They had both bulk and drums.

21 Q Did they also have a facility in Greenwood?

22 A In Greenwood?

23 Q Yeah.

24 A I don't know where Greenwood's at. I think

1 they probably do, but I don't know where the other
2 one was at.

3 Q Do you recall two separate facilities?

4 A Yeah, two separate facilities.

5 Q Do you recall a customer called Motive
6 Industries?

7 A Yes.

8 Q Where were they located?

9 A Off the expressway at 5200, in Chicago.

10 Q 5200 North Roosevelt?

11 A Um-hum, that's correct.

12 Q And where were they located -- I'm sorry.
13 What kind of waste did they generate?

14 A They hauled water, oil out of there. I'm
15 not sure, but I think we had a tank there, too.

16 Q Were they a large or a small account?

17 A Large.

18 Q And were they a customer the entire time
19 you were at U.S. Scrap?

20 A Yes.

21 Q Do you recall a company called Motorwheel
22 Corporation?

23 A Yes, but I don't know where at.

24 Q Would Mendota, Illinois be correct?

1 A Yeah, that's it. You're correct. Now I
2 know. We cleaned up big tanks there.

3 Q And you --

4 A That's a lot of water.

5 Q Do you recall what kind of waste other than
6 water?

7 A I don't remember the other product, but I
8 know it was a lot of water, a big tank that they had
9 there that we cleaned. We'd just go there once a
10 year and clean their tank.

11 Q Were they a customer the entire time you
12 were at U.S. Scrap?

13 A Yes.

14 Q Do you recall a customer called Nalco
15 Chemical or Nalco?

16 A No.

17 Q This company was located at 66th Street in
18 Bedford Park.

19 A Yes.

20 Q Do you recall it now?

21 A Now I remember.

22 Q Do you recall what kind of waste they
23 generated?

24 A Solvents.

1 Q And were they a large or a small account?

2 A I don't remember.

3 Q Do you recall if they were a customer the
4 entire time you were at U.S. Scrap?

5 A I don't remember.

6 Q Do you recall a company called Namsco?

7 A Namsco? Yes.

8 Q Do you recall where they were located?

9 A No.

10 Q Would 31st Street in Bellwood be correct?

11 A Right. That's it.

12 Q Do you recall what kind of waste they
13 generated?

14 A No.

15 Q Do you recall whether they were a large or
16 a small account?

17 A I don't remember.

18 Q Do you recall if they were a customer the
19 entire time you were at U.S. Scrap?

20 A I don't remember.

21 Q Do you recall a company called Nashua?

22 A Yes.

23 Q Do you recall where they were located?

24 A No.

1 Q Do you recall what kind of waste they
2 generated?

3 A No.

4 Q Do you recall if they were a division of
5 Johns-Manville?

6 A Right.

7 Q Do you recall if they were a large or a
8 small account?

9 A No, I don't remember.

10 Q Do you know if they were a customer the
11 entire time you were at U.S. Scrap?

12 A I don't remember.

13 Q Do you recall a customer called National
14 Can Company?

15 A National? Yes.

16 Q Do you recall where they were located?

17 A LaPorte.

18 Q Were there any other facilities other than
19 LaPorte?

20 A Yes, there was.

21 Q Okay. Do you recall where those were? I
22 have one listed in Summit, Illinois, on West 51st
23 Street.

24 A Right.

1 Q Do you recall that one?

2 A Yes.

3 Q Do you recall a facility at West 47th in
4 Chicago?

5 A Yes.

6 Q Okay. Do you recall what kind of waste
7 they generated?

8 A Water. Whatever chemical was in it, I
9 don't remember. Water, oil.

10 Q You don't recall what specific chemicals
11 were mixed in the water?

12 A No, no.

13 Q Were they a large or a small account?

14 A Yes, large.

15 Q And were they a customer the entire time
16 you were at U.S. Scrap?

17 A Yes.

18 Q Just for my own curiosity, Mr. Thompson,
19 you recall a lot of these wastes being water mixed
20 with various things. Why is it that the water
21 stands out in your mind?

22 A Because mostly it's water that we wash the
23 tanks down with, the sludge.

24 Q So, a lot of these are customers that

1 you're washing out their tanks for them?

2 A Yes. There would be a lot of water in, and
3 we'd put it into it in order to pick up the chemical
4 or whatever the product is, because you can't get it
5 off otherwise. And the majority -- a can company is
6 oil water, which they seal the tin can with, which
7 you cannot dump no place else.

8 Q Do you recall a customer called National
9 Precision Circuits?

10 A Yes.

11 Q Do you recall where they were located?

12 A If you can name the town, I can tell you if
13 it's right.

14 Q Franklin Park?

15 A Yeah.

16 Q Do you recall what kind of waste they
17 generated?

18 A No.

19 Q Do you recall whether they were a large or
20 a small account?

21 A I don't remember.

22 Q Do you recall if they were a customer the
23 entire time you were with U.S. Scrap?

24 A No, I don't remember.

1 Q Do you recall a customer called National
2 Steel Container?

3 A No.

4 Q Do you recall a customer called National
5 Wrecking Company?

6 A Natural?

7 Q National.

8 A Yeah, National Wrecking, right.

9 Q Do you recall what kind of waste they
10 generated?

11 A They are not a generator. They are -- they
12 hauled the debris in.

13 Q What kind of debris?

14 A Bricks, tearing buildings down.

15 Q Again, demolition debris?

16 A Demolition, right.

17 Q Did they generate any kind of --

18 A No. They hauled it in there and filled up
19 the holes.

20 Q I see. Did they generate any kind of
21 liquid waste?

22 A No.

23 Q Do you recall any of the U.S. Government
24 Nike Silo sites generating waste that went to U.S.

1 Scrap?

2 A Commonwealth Edison?

3 Q No. This would be Nike Silo sites located
4 in Jackson Park at 31st and Lake Shore Drive.

5 A I don't remember.

6 Q Okay. Mr. Martel told us there was a
7 one-time pick-up there, but if you weren't involved
8 with that, it's quite possible that you wouldn't
9 know.

10 Do you recall Outboard Marine Company being
11 a customer?

12 A Yes.

13 Q Do you recall where they're located?

14 A In Chicago they have one.

15 Q Do you recall a facility in Waukegan?

16 A Yes.

17 Q Do you recall what kind of waste they
18 generated?

19 A No.

20 Q Do you recall if they were a large or a
21 small account?

22 A No, I don't remember.

23 Q Okay. Do you know if they were a customer
24 the entire time you were at U.S. Scrap?

1 A No, I don't remember.

2 Q Do you recall a customer called PPG
3 Industries?

4 A Yes.

5 Q Do you recall where they were located?

6 A Oakdale -- Oak --

7 Q Oak Creek?

8 A Oak Creek, that's right.

9 Q In Wisconsin?

10 A Yes.

11 Q Okay. Do you recall what kind of waste
12 they generated?

13 A Paint, solvents.

14 Q Do you recall if they were a large or small
15 account?

16 A Large.

17 Q And were they a customer the entire time
18 you were at U.S. Scrap?

19 A Yes. We also hauled drums out of them.

20 Q Drums as well as bulk waste?

21 A Bulk.

22 Q Do you recall Penn-Dixie Steel being a
23 customer?

24 A No.

1 Q Do you recall Pierce-Stevens Chemical
2 Company being a customer?

3 A I don't remember.

4 Q Do you recall a customer called Pittsburgh
5 Metals?

6 A Yes.

7 Q Do you recall where they were located?

8 A No.

9 Q Do you recall what waste they generated?

10 A No.

11 Q Do you recall whether they were a large or
12 a small account?

13 A I don't remember.

14 Q And do you know if they were a customer the
15 entire time you were at U.S. Scrap?

16 A I don't remember.

17 Q Do you recall a customer called Precision
18 Twist Drill Company?

19 A Yes.

20 Q Where were they located?

21 A Way west.

22 Q Crystal Lake?

23 A Crystal Lake, right.

24 Q Do you recall what kind of waste they

*Precision
Twist*

1 generated?

2 A Yeah. That's that acid water.

3 Q And do you recall if they were a small or a
4 large account?

5 A A large.

6 Q And were they a customer the entire time
7 you were at U.S. Scrap?

8 A Yes.

9 Q Do you recall a customer called Prefinished
10 Metals?

11 A Yes.

12 Q Do you recall where they were located?

13 A No.

14 Q Would Elk Grove Village be correct?

15 A Yes, that's right. That's correct.

16 Q Do you recall what kind of waste they
17 generated?

18 A Solvents.

19 Q Okay. And were they a large or a small
20 account?

21 A I don't remember.

22 Q Do you recall if they were a customer the
23 entire time you were at U.S. Scrap?

24 A Yes, they were.

1 Q Do you recall a customer called Premier
2 Paints?

3 A Yes.

4 Q Do you recall where they were located?

5 A Chicago.

6 Q I have Elk Grove Village.

7 A Yeah, Chicago and Elk Grove.

8 Q Okay. Do you recall what kind of waste
9 they generated?

10 A Solvents, paint.

11 Q And were they a large or a small account?

12 A I don't remember.

13 Q Do you recall if they were a customer the
14 entire time you were at U.S. Scrap?

15 A Yes, they were.

16 Q Do you recall a company called
17 Proler-Chicago?

18 A Yes.

19 Q Do you recall where they were located?

20 A No.

21 Q Would 36th and California be correct?

22 A That's correct.

23 Q Do you recall what kind of waste they
24 generated?

1 A No, I don't.

2 Q Do you recall if it was liquid waste?

3 A I don't remember.

4 Q Do you recall whether they were a large or
5 a small account?

6 A No, I don't remember.

7 Q Mr. Martel told us at least some of their
8 waste consisted of automobile seat cushions. Does
9 that refresh your recollection, or no?

10 A No. I don't remember.

11 Q Okay. Do you recall a customer called
12 R. A. Briggs?

13 A Yes.

14 Q Do you recall where they were located?

15 A Lake Zurich.

16 Q Do you recall what kind of waste they
17 generated?

18 A Paint -- ink, ink, paint-like. They make
19 towels. They put the dye on towels. We'd haul 1500
20 gallons out of there every time we'd haul it.

21 Q So, how would that be done? Would you take
22 three tankers up there?

23 A 1500.

24 Q Oh, 1500.

1 A That's only -- we've got 5,000-gallon
2 tankers, and we take 1500. That's all they haul out
3 of there. They'd dump it in there, and that's all
4 we'd get paid for is 1500.

5 Now S.E.T. has it. It's their account.

6 Q How often would you haul out of there?

7 A Maybe once, twice a month.

8 Q Do you recall a customer called

9 R-Lite Chemical Coatings?

10 A No.

11 Q Do you recall a customer called R. R.

12 Donnelly & Sons?

13 A Yes.

14 Q Do you recall where they were located?

15 A Yes. They're on 22nd Street, right by the
16 expressway -- right by the --

17 Q Okay. I have Mattoon, Illinois. Do you
18 recall a facility --

19 A Yes, we did haul from one in Mattoon.

20 Q Did U.S. Scrap haul from both the Mattoon
21 and 22nd Street facilities?

22 A Yes.

23 Q Do you recall what type of waste they
24 generated?

1 A They were in drums, ink, not paint.

2 Q Do you recall whether they were a large or
3 a small account?

4 A Large.

5 Q And were they a customer the entire time
6 you were there at U.S. Scrap?

7 A Yes.

8 Q Do you recall a company called Rauland Tool
9 Company, which is a division of Zenith?

10 A Yes.

11 Q Do you recall where they were located?

12 A No.

13 Q Do you recall if I say Melrose Park?

14 A Yes. Right across the street from Benjamin
15 Moore?

16 Q Do you recall what kind of waste they
17 generated?

18 A No, I can't remember.

19 Q Do you recall if they were a large or a
20 small account?

21 A I can't remember.

22 Q Do you recall if they were a customer the
23 entire time you were at U.S. Scrap?

24 A Yes, they were.

1 Q Do you recall a customer called Reflector
2 Hardware?

3 A Yes.

4 Q Do you recall where they were located?

5 A Off of 25th Avenue in Melrose Park right
6 there.

7 Q And do you recall what kind of waste they
8 generated?

9 A No.

10 Q Do you know whether they were a large or a
11 small account?

12 A I don't remember.

13 Q Do you know if they were a customer the
14 entire time you were at U.S. Scrap?

15 A Yes, they were.

16 Q Do you recall a customer called Regal Tube?

17 A Yes.

18 Q And do you recall where they were located?

19 A Yeah. They're in -- off of Chicago.

20 What's it called? By Bedford Park. It's that
21 clearing industry right there, Bedford Park.

22 Q I have 73rd Street west of Cicero, is that
23 correct?

24 A West of Cicero, right, that's correct.

1 Acid water, we hauled out of there, lots.

2 Q They were a large account?

3 A Large, large.

4 Q And were they a customer the entire time
5 you were at U.S. Scrap?

6 A Yes. I think the other company got them.

7 Q Do you recall a customer called Reichhold
8 or Reichhold?

9 A Reichhold, yes.

10 Q Where were they located?

11 A I don't remember.

12 Q And do you recall what kind of waste they
13 generated?

14 A No, I don't.

15 Q Do you know if they were a large or a small
16 account?

17 A No.

18 Q Do you recall a customer called Reliance
19 Electric?

20 A Yes.

21 Q Where were they located?

22 A I don't remember offhand.

23 Q Do you recall what kind of waste they
24 generated?

1 A No.

2 Q Do you recall if they were a large or a
3 small account?

4 A No, I don't.

5 Q Do you recall whether Remington Arms
6 Company was a customer?

7 A I don't remember.

8 Q Do you recall if Republic Steel Corporation
9 was a customer?

10 A Yes.

11 Q Where were they located?

12 A 1700 Avenue O, Chicago.

13 Q I have 116th and South Burley in Chicago,
14 is that right?

15 A Yes, they had one there, too.

16 Q All right. Do you recall what kind of
17 waste they generated?

18 A We hauled hot tar out of there and acid.

19 Q And do you recall if they were a large or a
20 small account?

21 A Large.

22 Q Were they a customer the entire time you
23 were at U.S. Scrap?

24 A Yes.

1 Q Do you recall a customer called Resins,
2 Solvents & Varnishes?

3 A No, I don't.

4 Q No?

5 A No, I don't remember.

6 Q They would have been located in Chicago
7 Heights.

8 A I can't remember.

9 Q Okay. Do you recall a customer called
10 Revere Brass?

11 A What's the name of it?

12 Q Revere, as in Paul Revere, Brass.

13 A I don't remember.

14 Q Do you recall --

15 A That's in Franklin Park?

16 Q I don't know where it is.

17 A Okay. I don't remember that one. I
18 remember a brass company that we hauled for --

19 Q You mentioned Rex Chain earlier. Was that
20 also known as Rexnord?

21 A Yes.

22 Q Do you recall a customer called Richardson
23 Graphics?

24 A Yes.

1 Q Where were they located?

2 A I don't remember. I just remember the
3 name.

4 Q Would it refresh your recollection if I
5 told you they were on 151st Street in Orland Park?

6 A No.

7 Q Okay. Do you recall a company called Roper
8 Manufacturing?

9 A Yes.

10 Q Where were they located?

11 A Bradley, Illinois.

12 Q And what -- what kind of waste did they
13 generate?

14 A Solvent.

15 Q Were they a large or a small account?

16 A Large.

17 Q Were they a customer the entire time you
18 were at U.S. Scrap?

19 A Yes.

20 Q Do you recall a customer called Rust-Oleum?

21 A Yes.

22 Q Where were they located?

23 A North Side. I don't know what town it is.
24 By Skokie over there.

1 Q Okay. I have Oakton street in Evanston.

2 A Oakton, Evanston, yes. That is --

3 Q The same area. Do you recall what kind of
4 waste they generated?

5 A I think it was solvents that we hauled out
6 of there.

7 Q Do you recall if they were a large or a
8 small account?

9 A No, I don't remember.

10 Q Do you recall if they were a customer the
11 entire time you were at U.S. Scrap?

12 A Yes, they were.

13 Q Do you recall a company called Scholle or
14 Scholle Chemical?

15 A Right.

16 Q Do you recall where they were located?

17 A Northlake? Drums we hauled out of there.

18 Q Drums?

19 A Yes.

20 Q Okay. And that was West North Avenue in
21 Northlake?

22 A Right.

23 Q Do you recall what kind of waste they
24 generated?

1 A No, I don't.

2 Q Do you recall if they were a large or a
3 small account?

4 A I don't remember.

5 Q Were they a customer the entire time you
6 were at U.S. Scrap?

7 A I don't remember.

8 Q Do you recall a customer called Scott,
9 Inc.?

10 A Yes.

11 Q Where were they located?

12 A I don't remember.

13 Q Do you recall what kind of waste they
14 generated?

15 A Ink.

16 Q And do you recall if they were a large or a
17 small account?

18 A No, I don't.

19 Q Do you recall if they were a customer the
20 entire time you were at U.S. Scrap?

21 A I don't remember.

22 Q Do you recall a customer called Shakeproof?

23 A No.

24 Q Do you recall a customer called Signode?

1 A Yes.

2 Q Where were they located?

3 A Off of Harlem.

4 Q I have 71st Street in Bridgeview.

5 A In Bridgeview, right. Martel's brother
6 works there.

7 Q Do you recall what kind of waste they
8 generated?

9 A No, I can't remember. I don't know if it
10 was solvents we hauled for them or --

11 Q Were they a large or a small --

12 A Yeah, they were pretty large. We hauled
13 steady there.

14 Q And were they a customer the entire time
15 you were at U.S. Scrap?

16 A Yes.

17 Q Do you recall a company called Sigoli Metal
18 Plating?

19 A No.

20 Q Do you recall a customer called Sinclair &
21 Valentine?

22 A Yes.

23 Q Where were they located?

24 A I don't remember.

1 Q Okay. Do you recall what kind of waste
2 they generated?

3 A No.

4 Q Do you recall whether they were a large or
5 a small account?

6 A No, I don't remember.

7 Q Do you recall a customer called Size
8 Control?

9 A Yes.

10 Q Where were they located?

11 A I don't remember.

12 Q Do you recall what kind of waste they
13 generated?

14 A No.

15 Q Do you recall whether they were a large or
16 a small account?

17 A I don't remember. Just the name I
18 remember.

19 Q Do you recall a customer called Skil Power
20 Tool?

21 A Yes.

22 Q Where were they located?

23 A Off Elston, Chicago.

24 Q Okay. I have Wolfe Road in Wheeling.

1 A Wheeling?

2 Q Would that be correct?

3 A I don't remember now.

4 Q Okay. Do you recall what kind of waste
5 they generated?

6 A No.

7 Q You do recall Skil Power Tool being a
8 customer?

9 A Yes. I remember the name. When you come
10 with the names, I remember, but --

11 Q Okay.

12 A We're going back many years now. I don't
13 recall.

14 Q Okay. And that's fair enough. You may
15 remember some things and not others. Please tell me
16 that.

17 Do you recall if they were a large or a
18 small customer?

19 A I don't remember.

20 Q Do you recall a customer called Sommer &
21 Maca?

22 A Yes.

23 Q Do you recall where they were located?

24 A No.

1 Q Do you recall if it was West Ogden in
2 Chicago?

3 A That's correct.

4 Q Do you recall what kind of waste they
5 generated?

6 A No.

7 Q Do you recall if they were a large or a
8 small customer?

9 A No, I don't remember.

10 Q Do you recall if they were a customer the
11 entire time you were at U.S. Scrap?

12 A I don't remember.

13 Q Do you recall a customer called Specialty
14 Coatings?

15 A Yes.

16 Q Do you recall where they were located?

17 A No.

18 Q Do you recall what kind of waste they
19 generated?

20 A No.

21 Q Do you recall if they were a large or a
22 small account?

23 A I don't remember.

24 Q Do you know if they were a customer the

1 entire time you were at U.S. Scrap?

2 A I don't remember.

3 Q Do you recall a customer called Specified
4 Painting?

5 A Yes.

6 Q Do you know where they were located?

7 A No.

8 Q Do you recall what kind of waste they
9 generated?

10 A No.

11 Q Do you recall if they were a large or a
12 small account?

13 A I don't remember.

14 Q Do you know if they were a customer the
15 entire time you were at U.S. Scrap?

16 A I don't remember.

17 Q Do you recall a customer called Spot Nails?

18 A Yes.

19 Q Do you recall where they were located?

20 A I know it's way north.

21 Q Would that be Hicks Road in Rolling
22 Meadows?

23 A Hicks Road, right off of Hicks Road, that's
24 right.

1 Q Do you recall what kind of waste they
2 generated?

3 A They had a tank there, and it's 2500
4 gallons we hauled. The product, I don't remember
5 what the product was. Water.

6 Q Was it water mixed with some kind of
7 chemical?

8 A Yes, right. It's one big tank. It had
9 2500 gallons. We hauled there steady.

10 Q They were a pretty good customer?

11 A Yes, good customer.

12 Q Do you recall a customer called Standard T
13 Chemical?

14 A I remember the name. That's all I
15 remember, though.

16 Q Mr. Martel places them at 26th and Federal
17 in Chicago and 10th and Washington in Chicago
18 Heights. Does that refresh your recollection at
19 all?

20 A No.

21 Q Okay. Do you recall Stauffer Chemical
22 being a customer?

23 A Yes.

24 Q Do you recall where they were located?

1 A Hammond.

2 Q Okay. Do you recall a facility in Chicago
3 Heights that you hauled for?

4 A Yes.

5 Q Do you recall what kind of waste they
6 generated?

7 A No.

8 Q Okay. Do you recall if they were a large
9 or a small account?

10 A I don't remember.

11 Q Were they a customer the entire time you
12 were at U.S. Scrap?

13 A Yes.

14 Q Do you recall a customer called Stewart
15 Chemical or Stewart Paint Company?

16 A Yes.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall what kind of waste they
20 generated?

21 A Paint.

22 Q And do you recall whether they were a large
23 or a small account?

24 A I don't remember.

1 Q Were they a customer the entire time you
2 were at U.S. Scrap?

3 A Yes.

4 Q Do you recall a customer called Stein-Hall?

5 A Yes.

6 Q Do you recall where they were located?

7 A No.

8 Q Okay. Do you recall if it was in
9 Bridgeview, Illinois, at 78th Avenue?

10 A Yes.

11 Q Okay. Do you recall what kind of waste
12 they generated?

13 A No, I don't.

14 Q Do you know if they were a large or a small
15 account?

16 A I don't remember.

17 Q Okay. Were they a customer the entire time
18 you were at U.S. Scrap?

19 A I don't remember.

20 Q Do you recall a customer called
21 Stressan-Reuter Company?

22 A No.

23 Q Do you recall a customer called Stuart Oil
24 Company?

1 A Yes.

2 Q Do you recall where they were located?

3 A Chicago? No.

4 Q Do you recall what kind of waste they
5 generated?

6 A I would say oil. I think oil.

7 Q Do you recall whether they were a large or
8 a small account?

9 A No, I don't remember.

10 Q Okay. Do you recall a customer called Sun
11 Chemical Company?

12 A Yes.

13 Q Do you recall where they were located?

14 A By Melrose Park? You've got to give me an
15 address.

16 Q I have facilities listed in Northlake,
17 Bedford Park --

18 A Yes, yes,

19 Q -- and Kankakee.

20 A I don't remember the Kankakee one.

21 Q Okay. You recall Northlake and Bedford
22 Park?

23 A Yes.

24 Q Do you recall what kind of waste they

1 generated?

2 A Paint.

3 Q And do you recall if they were a large or a
4 small account?

5 A Large.

6 Q And were they a customer the entire time
7 you were at U.S. Scrap?

8 A Yes.

9 Q Do you recall a customer called Terminal
10 Transport?

11 A No.

12 Q Do you recall a customer called Texaco
13 Company?

14 A I don't remember.

15 Q Do you recall whether U.S. Scrap hauled for
16 Texaco located in Lockport?

17 A I don't remember.

18 Q Okay. Do you recall a customer called
19 Thompson Heywood Chemical?

20 A Yes.

21 Q Where were they located?

22 A We pumped drums there. I don't remember.

23 You name it, I can tell you if that's correct or
24 not.

1 Q That's one I don't have the --

2 A Well, it's on the North Side there.

3 Q Okay. In Chicago?

4 A Yes.

5 Q All right.

6 A I remember we pumped drums there, you know,
7 their solvents.

8 Q And the waste was solvents?

9 A Right.

10 Q Do you know if they were large or small?

11 A Large.

12 Q Do you recall a customer called Thor Power?

13 A I don't remember.

14 Q Do you know what kind of waste they
15 generated?

16 A No.

17 Q Do you recall if they were a small or large
18 account?

19 A I don't remember.

20 Q Do you recall Travenol being a customer or
21 Baxter-Travenol?

22 A No.

23 Q Do you recall a customer called Triple S
24 Etchants?

1 A No.

2 Q Do you recall a customer called Triumph
3 Twist Drill?

4 A No.

5 Q Okay. Do you recall picking up for a
6 facility located in Rhinelander, Wisconsin?

7 A Yes.

8 Q Okay.

9 A Was that the name of the company?

10 Q Yes.

11 A Yes. That's the one where we had the
12 two-tank deal there that had poisons.

13 Q Okay. And do you recall what -- any
14 other --

15 A We never hauled steady out of there. Once
16 every six months, something like that.

17 Q Okay. Were they a customer the entire time
18 you were at U.S. Scrap?

19 A Yes. We had a tank there.

20 Q Do you recall a customer called U.S.
21 Envelope?

22 A Yes.

23 Q Where were they?

24 A I don't remember.

1 Q Could they have been in North Chicago?

2 A I don't remember.

3 Q Do you recall what kind of waste they
4 generated?

5 A No.

6 Q Do you recall if they were a large or a
7 small account?

8 A I don't remember.

9 Q Do you recall a customer called U.S.
10 Reduction Company?

11 A Yes.

12 Q Do you recall where they were located?

13 A No.

14 Q Do you recall what kind of waste they
15 generated?

16 A No.

17 Q Do you recall hauling for a company located
18 at Chicago and Kennedy Avenues in East Chicago,
19 Indiana?

20 A Yes. That's right.

21 Q Do you recall what kind of waste you picked
22 up there?

23 A No, not offhand.

24 Q Do you recall if it was aluminum dust?

1 A I don't remember.

2 Q Okay. Do you know if U.S. Reduction was a
3 large or a small account?

4 A No.

5 Q Do you recall whether U.S. Steel of Gary
6 Works was a customer?

7 A Yes.

8 Q Where were they located?

9 A In East Chicago. We hauled acids, bad
10 acids, real bad.

11 Q Were they a large or a small account?

12 A Not too often did we haul out of there. I
13 don't remember.

14 Q Did you haul for them the entire time you
15 worked at U.S. Scrap?

16 A Yes.

17 Q Was U.S. Steel Products in Dolton,
18 Illinois, a customer?

19 A I don't know where they're at. I don't
20 remember that.

21 Q Okay. Do you recall a customer called
22 Union Camp?

23 A Yes.

24 Q Where were they located?

1 A Calumet City.

2 Q I have 100 Oakton Street in Des Plaines,
3 Illinois. Does that refresh your recollection at
4 all?

5 A Yes.

6 Q And what kind of waste did they generate?

7 A I don't remember.

8 Q Do you recall if they were a large or a
9 small account?

10 A No.

11 Q Were they a customer the entire time you
12 were at U.S. Scrap?

13 A I don't remember.

14 Q Do you recall Uniroyal, Incorporated, being
15 a customer?

16 A Yes.

17 Q Do you recall where they were located?

18 A Mishawaka.

19 Q Mishawaka, Indiana?

20 A Right.

21 Q Do you recall what kind of waste they
22 generated?

23 A Solvents, paints, drums and bulk, oil,
24 water.

1 Q Were they a pretty large customer?

2 A Yes.

3 Q And were they a customer the entire time
4 you were at U.S. Scrap?

5 A Yes.

6 Q Do you recall a customer called United
7 Wallpaper?

8 A I don't remember.

9 Q Do you recall a customer called Val Spar?

10 A Yes.

11 Q Where were they located?

12 A I don't remember. But I --

13 Q Would it refresh your recollection if I
14 said Rockford?

15 A Yeah, that's correct.

16 Q 200 Sawyer in Rockford?

17 A Right.

18 Q Do you recall what kind of waste they
19 generated?

20 A No.

21 Q Okay. Do you recall if this were a large
22 or a small account?

23 A I don't remember.

24 Q Do you recall if they were a customer the

1 entire time you were at U.S. Scrap?

2 A Yes, they were.

3 MR. KOWALSKI: Off the record.

4 (Discussion held off the record.)

5 MR. KOWALSKI: Back on the record.

6 BY MR. KOWALSKI:

7 Q Mr. Thompson, do you recall a customer
8 called Vandercook?

9 A No.

10 Q Do you recall a customer called Velsicol
11 Chemical?

12 A Velsicol? Yes.

13 Q Do you recall where they were located?

14 A No.

15 Q Do you recall if it was 340 East Ohio in
16 Chicago?

17 A No, I don't remember.

18 Q Okay. Do you recall what kind of waste
19 they generated?

20 A No.

21 Q Do you recall if they were a large or a
22 small account?

23 A I don't remember.

24 Q Do you recall a company called Venus

1 Laboratories?

2 A Yes.

3 Q Do you recall where they were located?

4 A I don't remember.

5 Q Would it refresh your recollection if I
6 said Lively Boulevard in Wood Dale, Illinois?

7 A I heard the name, but I can't remember.

8 Q Do you recall what kind of waste they
9 generated?

10 A No, I don't.

11 Q Do you recall if they were a large or a
12 small account?

13 A I don't remember.

14 Q Do you recall a customer called Victor
15 Gasket?

16 A No.

17 Q Do you recall a company called W. C.
18 Richards?

19 A I don't remember.

20 Q Do you recall if William Wrigley Company
21 was a customer?

22 A I ain't for sure. I don't remember.

23 Q Do you recall if Warner Electric was a
24 customer?

1 A Yes.

2 Q And do you recall where they were located?

3 A No, I don't.

4 Q Do you recall what kind of waste they
5 generated?

6 A I don't remember.

7 Q Do you recall if they were a large or a
8 small account?

9 A I don't remember.

10 Q Do you recall a customer called Warwick
11 Electronics?

12 A No.

13 Q Do you recall a customer called Western
14 Electric?

15 A Yes.

16 Q Do you recall where they were located?

17 A 26th street and Cicero.

18 Q I have 22nd and Cicero.

19 A Right. 22nd, 26th.

20 Q Is that also known as the Hawthorne Works?

21 A Yes, Hawthorne.

22 Q Do you recall what kind of waste they
23 generated?

24 A We hauled acids.

1 Q And were they a large or a small account?

2 A Large.

3 Q Were they a customer the entire time you
4 were at U.S. Scrap?

5 A Yes.

6 Q Do you recall whether Wilson Sporting Goods
7 was a customer?

8 A I don't remember. I think I remember the
9 name, but I'm not sure.

10 Q Okay. Do you recall a customer called
11 Witco Chemical?

12 A I don't remember.

13 Q Do you recall a customer called Wyco Tool
14 Company?

15 A Yes.

16 Q Do you recall where they were located?

17 A No, I don't.

18 Q Do you recall what kind of waste they
19 generated?

20 A No, I don't.

21 Q Do you recall if it was a large small
22 account?

23 A I don't remember.

24 Q Do you recall a customer called Wycoff

1 Steel Company?

2 A Wycoff Steel, yes.

3 Q Do you recall where they were located?

4 A 37th and Kedzie.

5 Q And do you recall what kind of waste they
6 generated?

7 A Acid and water.

8 Q Were they a large or a small account?

9 A I don't remember.

10 Q Okay. Were they a customer the entire time
11 you were at U.S. Scrap?

12 A Yes.

13 Q Do you recall a customer called Wyman
14 Gordon?

15 A Yes.

16 Q Do you recall where they were located?

17 A Yes. Harvey, Illinois.

18 Q Do you recall what kind of waste they
19 generated?

20 A Acids.

21 Q Were they a large or a small company?

22 A Yes.

23 Q Large account?

24 A Yes.

1 Q Was Xerox Corporation a customer?

2 A Yes.

3 Q Do you recall where they were located?

4 A 22nd and -- they call it Oak -- right off
5 the toll road.

6 Q That's Swift Drive?

7 A Swift Drive, right. That's exactly right.

8 Q Do you recall what kind of waste they
9 generated?

10 A A lot of water. It was water, but some
11 chemical mixed with it. It was pure white. I
12 remember that we hauled it. It's right on the grass
13 when we pump it up.

14 Q Do you recall whether they were a large or
15 a small account?

16 A Small account.

17 Q Do you recall a company called Miller
18 Pre-Pared Potatoes?

19 A I've heard of the name, but where they're
20 at, I don't remember. The name, I'm pretty sure I
21 was on.

22 Q Do you recall what kind of waste they
23 generated?

24 A No.

1 Q Do you recall a customer called Wheting or
2 Whetting Corporation, W-h-e-t-i-n-g?

3 A Whetting Corporation? No, I don't
4 remember.

5 Q Do you recall a customer called Wilson &
6 Company?

7 A Yes.

8 Q Do you recall where they're located?

9 A No, I don't remember.

10 Q Do you recall whether it was Cal. City,
11 Calumet City?

12 A Yes. That's it.

13 Q Do you recall what kind of waste they
14 generated?

15 A That was -- they made medicine there.
16 That's when one of our drivers got blown up. It
17 stunk real bad. It could have been that cow stuff,
18 too, because it was bad. One of our drivers got
19 hurt real bad.

20 Q He was blown up? What happened there?

21 A Sucking the tank, and he blew up. And he's
22 got about eight kids, and he busted his ankles all
23 the way up. And he was trying to collect Workman's
24 Comp. and all of that and didn't get it.

1 Q Do you recall which driver that was?

2 A He had two brothers who worked there. One
3 was red. I don't remember their names. The other
4 one was his brother that came from south and he come
5 to work there for us.

6 And he had a lot of kids. And he wasn't
7 there two weeks, and he got hurt there at that
8 place, that factory there. They make medicine. I
9 think we had a tank there. It looked like an O'Ryan
10 tank we used to haul oil. Them old tanks in the
11 olden days, like a pump they call it.

12 Q Was that a large account or a small
13 account?

14 A We hauled steady out of there.

15 Q Do you recall a customer called Ferro
16 Engineering?

17 A No.

18 Q Okay.

19 A I think -- no, I don't remember.

20 Q It would have been in Calumet City.

21 A Yeah.

22 Q On State and Burnham Road. Does that
23 refresh your recollection at all?

24 A No.

1 Q Do you recall a customer called Bulk
2 Terminal Transport?

3 A Yes.

4 Q Do you recall where they were located?

5 A 122nd and Stoney Island.

6 Q I have 124th and Stoney Island.

7 A Um-hum.

8 Q Do you recall what kind of waste they
9 generated?

10 A All kinds, stuff I can't remember.

11 Q Was that a semi tank trailer cleaning
12 facility?

13 A Yeah, they would -- I think they'd come in
14 with tanks there, and we'd suck the tanks out.

15 Q Now, were they a large or a small account?

16 A I don't remember.

17 Q Okay. Do you recall a customer called
18 Accutronics?

19 A Yes, I do.

20 Q Do you recall where they were located?

21 A No, I don't.

22 Q Do you recall what kind of waste they
23 generated?

24 A No.

1 Q Do you recall a customer called Acme Steel
2 Company?

3 A Yes.

4 Q Do you recall where they were located?

5 A Riverdale.

6 Q Were they related somehow to Interlake?

7 A Interlake. They were combined. It was
8 Acme Steel, and Interlake bought Acme Steel out.

9 Q I see. Do you recall what kind of waste --

10 A At the time we hauled it it was Acme Steel,
11 and when we cleaned up the river it turned into
12 Interlake.

13 Q Do you recall what kind of waste they
14 generated?

15 A Acids we hauled out of there, water.

16 Q Were they a large or a small account?

17 A Large at that time.

18 Q Do you recall a customer called Active
19 Service?

20 A No, I don't.

21 Q Do you recall a customer called Advanced
22 Transformer?

23 A Yes.

24 Q Where were they located?

1 A Off of Western Avenue.

2 Q Would 2950 North Western Avenue be correct?

3 A Right, that's correct.

4 Q And do you recall what kind of waste they
5 generated?

6 A No.

7 Q Do you recall if they were a large or a
8 small account?

9 A I don't remember.

10 Q Do you recall a customer called Albany,
11 A-l-b-a-n-y?

12 A I don't remember, no.

13 Q Do you recall a customer called
14 Alco-Gravier, Alco-Gravier.

15 A Alco-Gravier? Yes.

16 Q Do you recall where they were located?

17 A No, I don't.

18 Q Would it refresh your recollection if I
19 said at 16th and Western in Chicago?

20 A Yes, that's it.

21 Q Do you recall what kind of waste they
22 generated?

23 A No.

24 Q Do you recall if they were a large or a

1 small account?

2 A I don't remember.

3 Q Do you recall a customer called Allis
4 Chalmers?

5 A Yes.

6 Q Do you recall where they were located?

7 A Harvey, Harvey, Illinois.

8 Q And do you recall what kind of waste they
9 generated?

10 A Acids, water. They had tanks in the
11 basement we pumped out.

12 Q Were they a large or a small account?

13 A Large.

14 Q Do you recall a customer called American
15 Name Plate?

16 A I don't remember.

17 Q Do you recall a customer called American
18 Printer Magazine?

19 A I don't remember.

20 Q Do you recall a customer called American
21 Rivet?

22 A I don't remember.

23 Q Do you recall a customer called Anderson
24 Manufacturing?

1 A Yes.

2 Q Do you recall where they were located?

3 A No.

4 Q Would it refresh your recollection if I
5 said Michigan City, Indiana?

6 A Yes, that's correct.

7 Q Do you recall what kind of waste they
8 generated?

9 A No, I don't.

10 Q Do you recall if they were a large or a
11 small customer?

12 A I don't remember.

13 Q Do you recall a customer called APPCO,
14 A-P-P-C-O, Metal?

15 A Yes.

16 Q Do you recall where they were located?

17 A No.

18 Q Do you recall what kind of waste they
19 generated?

20 A No.

21 Q Do you recall if they were a large or a
22 small account?

23 A I don't remember.

24 Q Do you recall a customer called Armstrong

1 Chemicals?

2 A Yes.

3 Q Do you recall where they were located?

4 A I don't remember.

5 Q Do you recall what kind of waste they
6 generated?

7 A No, I don't.

8 Q Do you recall if they were a large or a
9 small account?

10 A I don't remember them. When I say the
11 names, that means that I remember the names, you
12 know, but -- you know, like I said, we're going back
13 again. I can't remember their addresses. If you
14 say it, let me know. Maybe I might remember. Names
15 I remember. Sometimes I know the names of the town,
16 and sometimes I don't.

17 Q Okay. Fine. Do you recall whether Avon
18 was a customer?

19 A Yes.

20 Q Do you recall where they were located?

21 A North Avenue. That's up there.

22 Q And do you recall what kind of waste they
23 generated?

24 A Well, some -- I don't remember if this

1 company was in business at that time or not. In
2 Morton Grove they had a plant, too, which is a big
3 plant. And I don't remember if Martel hauled for
4 them or not, but I know another company that did
5 haul for them.

6 They hauled perfume and then shaving cream
7 and all of that cosmetics which we hauled for them.
8 They also have water and some other product that we
9 hauled for them mixed.

10 Q Do you recall whether they generated any
11 chemicals or solvents?

12 A Yes.

13 Q Okay. Were they a large or a small account
14 of U.S. Scrap?

15 A I don't remember.

16 Q Okay. Do you recall a customer called
17 B & J Plastics Manufacturing?

18 A No, I don't remember them.

19 Q Do you recall a customer called Betz,
20 B-e-t-z, Laboratories?

21 A Yes.

22 Q Where were they located?

23 A Elk Grove over there.

24 Q Do you recall what kind of waste they

1 generated?

2 A We pumped tanks, I remember. Acids and
3 water, solvents. I guess that's what we pumped
4 there, solvents.

5 Q Were they a large or a small account?

6 A I can't remember. I can't recall.

7 Q Do you recall a customer called Boyar
8 Schultz?

9 A I don't remember.

10 Q We have them located at 702 Main Street in
11 Rockford.

12 A I don't remember.

13 Q Okay. Do you recall a customer called
14 Bruce Horn?

15 A No.

16 Q Do you recall a customer called Calumet
17 Screw Machine?

18 A Is that the one in Riverdale?

19 Q I don't have an address.

20 A No, I don't.

21 Q Do you recall a customer called Cellofilm?

22 A I don't remember.

23 Q Do you recall a customer called Central
24 Scientific?

1 A No.

2 Q Do you recall a customer called Chem Trust?

3 A Yes.

4 Q Do you recall where they were located?

5 A No, I don't remember.

6 Q Do you recall what kind of waste they
7 generated?

8 A (No audible response.)

9 Q That's no?

10 A No, I don't remember.

11 Q Do you recall if they were a large or a
12 small account?

13 A I don't remember.

14 Q Do you recall a customer called Chicago
15 Adhesive?

16 A Yes.

17 Q Do you recall where they were located?

18 A Not offhand, no.

19 Q Okay. Do you recall what kind of waste
20 they generated?

21 A Water and sticky stuff, like glue.

22 Q Would it refresh your recollection if I
23 said 4758 West 60th Street in Chicago?

24 A That's correct.

1 Q Okay. And were they a large or a small
2 account?

3 A I don't remember.

4 Q Do you recall a customer called Chicago
5 Metals?

6 A I don't remember.

7 Q Do you recall a customer called Chicago
8 Rotoprint?

9 A Yes.

10 Q Do you recall where they were located?

11 A No.

12 Q Do you recall what kind of waste they
13 generated?

14 A I don't remember.

15 Q Do you recall if they were a large or a
16 small account?

17 A I don't remember.

18 Q Do you recall a customer called Commercial
19 Solvents?

20 A Yes.

21 Q Do you recall where they were located?

22 A No, I don't.

23 Q Do you recall what kind of waste they
24 generated?

1 A Well, I'm just saying solvents, but I don't
2 remember. I couldn't tell you, really.

3 Q Do you recall if they were a large or a
4 small account?

5 A I don't remember.

6 Q Do you recall a customer called Continental
7 Cleaning?

8 A No, I don't remember.

9 Q Do you recall a customer called Contour
10 Saws?

11 A No, I don't remember that either.

12 Q Do you recall whether Mr. Martel hauled
13 waste for Cook County Hospital?

14 A I think so, but I don't remember. But I
15 think he did. It would be in the daytime anyway, if
16 he did haul it. Most of the time, I hauled at
17 night.

18 Q Okay. Do you recall what kind of waste
19 this was?

20 A No.

21 Q Do you recall if it was a large or a small
22 account?

23 A I don't remember it.

24 Q Do you recall a customer called Koroname?

1 A Yes.

2 Q Do you recall where they were located?

3 A No.

4 Q Would it refresh your recollection if I
5 said 2055 Ruby in Melrose Park?

6 A Yes.

7 Q Okay. Do you recall what kind of waste
8 they generated?

9 A No.

10 Q Do you recall if they were a large or a
11 small account?

12 A I don't remember.

13 Q Do you know if they were a customer the
14 entire time you were at U.S. Scrap?

15 A I don't remember.

16 Q Do you recall a customer called Cullegan
17 Fire Protection?

18 A No.

19 Q Do you recall a customer called Cuneo
20 Solvents?

21 A No.

22 Q Do you recall a customer called Custom
23 Metals?

24 A No.

1 Q Do you recall a customer called Delaware
2 Plastics?

3 A No, I don't remember.

4 Q Do you recall a customer called Desa
5 Industries?

6 A No.

7 Q Do you recall a customer called Dublin,
8 D-u-b-l-i-n, Company?

9 A No.

10 Q Do you recall a customer called Dutone,
11 D-u-t-o-n-e?

12 A Dutone?

13 Q Yes.

14 A No.

15 Q Do you recall a customer called Elgin
16 Machine?

17 A No.

18 Q Do you recall a customer called Federal
19 Tool & Plastics?

20 A No.

21 Q Do you recall hauling waste for a customer
22 called Ford Motor Company?

23 A Ford Motor? Yes.

24 Q And where were they located?

1 A Got one in Chicago Heights, got one at
2 130th and Torrence.

3 Q And what kind of waste was hauled for them?

4 A Paint, solvents.

5 Q And U.S. Scrap hauled waste for both of
6 those facilities?

7 A Yes.

8 Q And was Ford a large or a small customer?

9 A Large.

10 Q And they were a customer the entire time
11 you were at U.S. Scrap?

12 A Yes.

13 Q Do you recall a customer called Frank
14 Currau Company?

15 A No.

16 Q Do you recall a customer called Gard
17 Industries?

18 A No.

19 Q Do you recall a customer called Handschy
20 Chemical?

21 A You mean Handschy Chemical?

22 Q Handschy Chemical.

23 A Yeah. They're off of Riverdale and 138th
24 Street.

1 Q Okay. Do you recall what kind of waste
2 they generated?

3 A They've got paint.

4 Q Were they a large or a small customer?

5 A Small.

6 Q Were they a customer the entire time --

7 A No. They had ink there. It was ink. It
8 wasn't paint; it was ink.

9 Q Were they a customer the entire time you
10 were out at U.S. Scrap?

11 A I don't recall.

12 Q Do you recall a customer called Heat Bath
13 Company?

14 A No, I don't remember.

15 Q Do you recall a customer called Hooker
16 Glass?

17 A No.

18 Q Do you recall a company called SMF, Inc.?

19 A No.

20 Q Do you recall a Inland Steel Company being
21 a customer?

22 A Yes.

23 Q Where were they located?

24 A East Chicago.

1 Q And what kind of waste did they generate?

2 A Acids.

3 Q Were they a large or a small account?

4 A I don't remember.

5 Q Did you haul for Inland the entire time you
6 were at U.S. Scrap?

7 A Yes.

8 Q Do you recall a company called Jataglio or
9 Jataglio Service?

10 A I don't remember.

11 Q Do you recall a customer called J & S Tin
12 Mill Products?

13 A I don't remember them.

14 Q Do you recall a customer called John L.
15 Armitage?

16 A I don't remember.

17 Q Do you recall a customer called Kerr
18 Chemical?

19 A No, I don't remember.

20 Q Do you recall a customer called KMS?

21 A Yes.

22 Q Where were they located?

23 A I don't remember.

24 Q Do you recall what kind of waste they

1 generated?

2 A No, I don't.

3 Q Do you recall if they were a large or a
4 small account?

5 A I don't remember them.

6 Q Do you recall a customer called Liquid
7 Dynamics?

8 A Wasn't that another generator, Liquid
9 Dynamics? They're a tank-up business.

10 Q Could be.

11 A Well, they're out of business now, but they
12 were bad.

13 Q Did Martel ever haul for them?

14 A Liquid Dynamics?

15 Q Yeah.

16 A I can't remember. I think so, but I can't
17 remember.

18 Q Okay. Do you recall a customer called
19 Lisner, L-i-s-n-e-r?

20 A Yes.

21 Q Where were they located?

22 A I don't remember.

23 Q Okay. Do you recall what kind of waste
24 they generated?

1 A No, I don't.

2 Q Do you recall if they were a large or a
3 small account?

4 A Aren't they the ones over on -- by the
5 Tribune place down there? Aren't they located in
6 there, on Wacker Drive over there?

7 Q By the Tribune Building?

8 A Yeah. That's -- we hauled for them, but I
9 don't remember, you know --

10 Q All right. Do you recall a customer called
11 Luminous Ceiling?

12 A No.

13 Q That would be on Chestnut Street in Morton
14 Grove.

15 A No.

16 Q Do you recall a customer called Mass &
17 Waldstein?

18 A No, I don't remember.

19 Q Do you recall a customer called Marvel
20 Metal?

21 A Yes.

22 Q Do you recall where they were located?

23 A 43rd Street in Chicago?

24 Q Do you recall what kind of waste they

1 generated?

2 A No, I don't.

3 Q Do you recall if they were a large or a
4 small account?

5 A I don't remember.

6 Q Do you recall a customer called Metal
7 Industry?

8 A Yes.

9 Q Where were they located?

10 A I don't remember.

11 Q Do you recall what kind of waste they
12 generated?

13 A No.

14 Q Do you recall if they were a large or a
15 small account?

16 A I don't remember. Are they the ones on --
17 by Roosevelt Road over there?

18 Q On Roosevelt Road?

19 A Yeah.

20 Q I don't know. I don't have an address for
21 that particular one.

22 A Oh, okay.

23 Q Do you recall a customer called Metal
24 Reclaiming Corporation?

1 A No.

2 Q Do you recall a customer called Midwest
3 Electrics?

4 A Yes.

5 Q Do you recall where they were located?

6 A Not offhand.

7 Q Does it refresh your recollection if I say
8 1639 West Walnut in Chicago?

9 A No, I don't remember.

10 Q Do you recall what kind of waste they
11 generated?

12 A No.

13 Q Do you recall if they were a large or a
14 small account?

15 A I don't remember.

16 Q Do you recall a customer called Mirror
17 Reflector Service Company?

18 A No, I don't remember.

19 Q Do you recall -- we had discussed Mobil Oil
20 being a customer earlier. Do you recall hauling for
21 a facility located at 3800 South Cicero Avenue in
22 Cicero?

23 A I don't remember.

24 Q Do you recall a customer called Modine

1 Manufacturing Company?

2 A Yes.

3 Q Do you recall where they're located?

4 A They've got one in Racine. They've got one
5 in LaPorte. I don't know where they all are, but I
6 know the factories. They make -- they make little
7 radiators for cars.

8 Q Do you recall hauling for them?

9 A I don't remember.

10 Q So, you know where the facilities are, but
11 you're not sure --

12 A I'm not sure if Martel had them or not.

13 Q Okay. Do you recall a customer called
14 Moffet Tech Center?

15 A No.

16 Q Do you recall a customer called National
17 Bronze?

18 A Yes.

19 Q Do you recall where they were located?

20 A By Franklin Park.

21 Q Do you recall what kind of waste they
22 generated?

23 A That's that blue stuff, but I don't know
24 what the heck to call it. They've got it treated.

1 I don't -- that's the same stuff I was trying to
2 find out before, but I can't remember.

3 Q Okay. Do you recall if they were a large
4 or a small account?

5 A Small.

6 Q Were they a customer the entire time you
7 were at U.S. Scrap?

8 A Yes.

9 Q Do you recall a customer called National
10 Celofilm?

11 A No, I don't remember.

12 Q Do you recall a customer called Northwest
13 Salvage?

14 A I don't remember.

15 Q Do you recall a customer called Northwest
16 Screen Print?

17 A I don't remember.

18 Q Do you recall whether Northwestern
19 University was a customer?

20 A I don't remember.

21 Q Do you recall whether Owens-Corning or
22 Owens-Illinois was a customer?

23 A Yes.

24 Q Do you recall which it was in particular?

1 A The one there in Dolton.

2 Q Would that be the facility at 440 East
3 138th Street?

4 A Yes, it would.

5 Q Okay. Do you recall what kind of waste
6 they generated?

7 A No, I don't.

8 Q Were they a large or a small customer?

9 A I don't remember.

10 Q Okay. Do you recall a customer called
11 Paisley Products?

12 A No, I don't remember.

13 Q That would be at 17th and Canal in Chicago.

14 A I don't remember.

15 Q Do you recall a customer called Penray?

16 A No.

17 Q Do you recall a customer called Pauncher
18 Industries?

19 A No.

20 Q Do you recall a customer called Preheler or
21 Preheler Electrical?

22 A No.

23 Q Do you recall a customer called Reliable
24 Engineering Service?

1 A No.

2 Q Do you recall a customer called Reliance
3 Universal?

4 A Yes.

5 Q Do you recall where they were located?

6 A No.

7 Q Do you recall what kind of waste they
8 generated?

9 A No.

10 Q Do you recall if they were a large or a
11 small account?

12 A I don't remember.

13 Q Do you recall a customer called Rockola
14 Manufacturing?

15 A No.

16 Q Do you recall a customer called Rohn &
17 Hass?

18 A No.

19 Q Do you recall a customer called Role Print
20 Packaging?

21 A I don't remember.

22 Q Do you recall a customer called St. Charles
23 Manufacturing?

24 A I don't know if that's the name of the one

1 in St. Charles or not, the chair factory.

2 Q I'm sorry?

3 A Makes chairs there? Is that the one?

4 Q I don't know. Did you haul for a chair --

5 A We hauled two accounts over there in
6 St. Charles, but I can't recall them.

7 Q What kind of waste did the chair factory
8 produce?

9 A That was the acids and the water, which was
10 right along the river there.

11 Q That's along the Fox River?

12 A Yes, along the Fox River. I don't remember
13 if that was the name of the company or not.

14 Q Okay. That company you mentioned, do you
15 recall the street it was located on?

16 A Right off of North Avenue. Gee, I don't
17 remember the street.

18 Q Okay. Do you recall Sherwin Williams being
19 a company?

20 A Yes, it was.

21 Q I'm sorry. A customer.

22 A Yes, it was.

23 Q Where was it located?

24 A 115th and Cottage Grove.

1 Q Located right next to the U.S. Scrap
2 center?

3 A Right.

4 Q What kind of waste did you haul for them?

5 A We -- I wasn't there when they hauled it,
6 but he did have them for a customer.

7 Q Okay. How do you know that?

8 A Because they said so. I mean, Bates used
9 to have -- but we don't haul them anymore.

10 Q I see. They previously had been a
11 customer, but Martel had lost them for whatever
12 reason?

13 A Right. That was before me.

14 Q Okay. Do you recall a customer called
15 Stenograph?

16 A No.

17 Q Do you recall a customer called Transport
18 Service?

19 A Yes.

20 Q Do you recall where they were located?

21 A No, I don't remember.

22 Q Do you recall what kind of waste they
23 generated?

24 A No.

1 Q Do you recall if they were a large or a
2 small account?

3 A No.

4 Q Do you recall a customer called Western
5 Community?

6 A No.

7 Q Do you recall a customer called Young
8 Spring & Wire?

9 A No.

10 Q Do you recall a customer called Technical
11 Products?

12 A No.

13 Q Just to clarify, Mr. Thompson, you stated
14 earlier that you personally did not take any waste
15 out to 9th Avenue, is that correct?

16 A That's correct.

17 Q To your knowledge, most of the dumping that
18 was done out there was dumped during the night,
19 correct?

20 A His 9th Avenue wasn't a dump site, as far
21 as I remember. You know, I left when he had that
22 problem. No, I couldn't have. I've got to be
23 there.

24 My knowledge is that they used to do the

1 drums there, I think. The drums came there, and
2 then they dumped the drums. I think that's what my
3 knowledge is. Not bulk over there. It was too
4 small of a place.

5 Q When you say they dumped the drums there,
6 did they dump the liquid in the drums there?

7 A Yes.

8 Q Okay. To your knowledge -- and if you
9 don't know, please tell me you don't know. To your
10 knowledge, was there any distinction made between
11 what went to 9th and what went to Scrap in terms of
12 kind of waste other than drums versus bulk?

13 A (No audible response.)

14 Q No?

15 A Nothing. I have no knowledge about
16 anything about that.

17 Q So, the waste from these companies we just
18 went over could have gone to either site?

19 A All sites.

20 Q Okay. Do you know if the paperwork for the
21 waste that went to 9th Avenue was any different than
22 the paperwork for the waste that went to U.S. Scrap?

23 A It all came into the main yard and went.

24 Q Okay. Would there be any paperwork kept

1 showing that waste was going to 9th Avenue as
2 opposed to U.S. Scrap?

3 A No, sir.

4 Q These load tickets and customer invoices
5 that we discussed earlier, those wouldn't have
6 anything written on them regarding which site the
7 waste was going to, is that correct?

8 A That's correct.

9 Q Okay.

10 A I think mostly, as I said, the 9th must
11 have been -- that's where Earl worked. He emptied
12 the drums there. That's where he got hurt. It was
13 either 9th or 15th avenue. He had two sites there,
14 15th and 9th. One he was going to buy the property
15 for a house there, and I remember he didn't buy it
16 and he just dumped on it.

17 The 9th was the small one. Most things
18 didn't go on there. The most I remember was the
19 Morton Company. That was real bad stuff. That was
20 really bad, the ammonia. I think most their company
21 went there, because we hauled a lot of things out of
22 Morton Chemical.

23 Those people got sick, you know, when you
24 dump that.

1 MR. KOWALSKI: Okay. Mr. Thompson, the final
2 thing here is the court reporter is going to write
3 up your deposition in a booklet form, like I have
4 here. And you have the option of --

5 THE WITNESS: Of signing it?

6 MR. KOWALSKI: -- of signing it after reading it
7 or doing what we call waiving signature and trusting
8 that the court reporter took down your testimony
9 accurately. If you wish to --

10 THE WITNESS: Well, I believe that he did.

11 MR. KOWALSKI: Okay. So you waive signature?

12 THE WITNESS: Do you want me to sign it? I'll
13 sign it. It's no problem. I believe he did. He
14 knows how to run the machine, so I believe he knows
15 exactly what I said.

16 MR. KOWALSKI: Okay.

17 THE WITNESS: There's nobody (hear|here) but us.

18 MR. KOWALSKI: Okay. You can reserve the right
19 to read through it and sign it for accuracy.

20 THE WITNESS: No, I don't want to. I just don't
21 want to be called again, not unless it's very
22 important.

23 MR. KOWALSKI: So, you wish to waive signature.
24 You don't want to reserve the right to read it and

1 sign it?

2 THE WITNESS: No. I'll sign it. But I don't
3 want to read it. I don't want to waste my time. I
4 believe him. Is that what you want is my signature
5 on it? Is that I believe in my own mind it's true.

6 MR. KOWALSKI: You can read through your
7 testimony for errors and then sign it. You can do
8 that, or you can trust that he took it down
9 accurately and not go through signature.

10 THE WITNESS: I will trust him.

11 MR. KOWALSKI: Okay. So you're waiving
12 signature?

13 THE WITNESS: Yeah, I believe him.

14 MR. KOWALSKI: Okay. Very good.

15

16 ----oOo----

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24

1 STATE OF ILLINOIS)
) SS:
2 COUNTY OF C O O K)

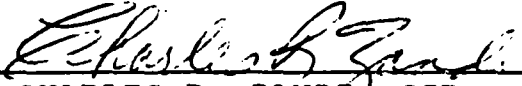
3
4 I, CHARLES R. ZANDI, CSR, a notary
5 public in and for the County of Cook and State of
6 Illinois, do hereby certify that ROBERT THOMPSON was
7 by me first duly sworn to testify to the truth, the
8 whole truth, and nothing but the truth, and that the
9 above deposition was recorded stenographically by me
10 and reduced to typewriting by me.

11
12 I FURTHER CERTIFY that the foregoing
13 transcript of the said deposition is a true,
14 correct, and complete transcript of the testimony
15 given by the said witness at the time and place
16 specified hereinbefore.

17
18 I FURTHER CERTIFY that I am not a
19 relative or employee or attorney or counsel of any
20 of the parties, nor a relative or employee of such
21 attorney or counsel, or financially interested
22 directly or indirectly in this action.

1 I FURTHER CERTIFY that my certificate
2 annexed hereto applies to the original and typed
3 transcripts only, signed and certified transcripts
4 only. I assume no responsibility for the accuracy
5 of any reproduced copies not made under my control
6 or direction.

7
8 IN WITNESS WHEREOF, I have hereunto
9 set my hand and affixed my seal of office at
10 Chicago, Illinois, this 12th day of September,
11 A.D. 1988.

12
13 
14 CHARLES R. ZANDI, CSR
15 188 West Randolph Street
16 Chicago, Illinois 60601
17 (312) 984-1033

18
19
20
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24 C.S.R. License No. 84-3058.

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(312) 984-1033 • (312) 346-4179
Outside Illinois call 1(800) 443-7108

October 12, 1988

MS. YOLANDA TYREE
2741 South Archer Avenue
Chicago, Illinois 60608

In Re: U.S. Scrap Corp. and 9th Avenue Dump
Deposition of: Yolanda Tyree

Dear Ms. Tyree:

Enclosed is a copy of your deposition taken on September 21, 1988 in the above entitled case. It is now ready for reading and signing as required by law, and must be completed within 30 days of receipt of the transcript.

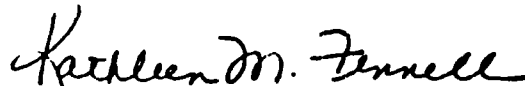
Please read your deposition and make any and all corrections that you may have on the correction pages enclosed at the back of the transcript. Do not make any markings on the transcript itself. After reading the deposition, you must sign the correction page(s) and the Witness Signature Page (page 103) before a Notary Public.

Upon completion of reading and signing your deposition, please forward the transcript with the signed correction pages and signature page to me at the above address.

If you have any questions regarding this procedure, please call me at the above telephone number.

Very truly yours,

BAKER, FENNELL & ASSOCIATES, INC.


Kathleen M. Fennell

KMF/jmc

cc: Mr. Edward Kowalski/
Ms. Ann C. Tighe

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

In Re the Matter of:)
)
U.S. SCRAP CORPORATION)
Chicago, Illinois)
)
and)
)
9th AVENUE DUMP)
Gary, Indiana)

The discovery deposition of YOLANDA
TYREE, taken in the above-entitled cause, before
Maria Miramontes, C.S.R., a Notary Public within
and for the County of Cook and State of Illinois
at 111 West Jackson Street, Chicago, Illinois, on
September 21, 1988, at the hour of 10:00 o'clock
a.m.

BAKER, FENNEL & ASSOCIATES, INC.

188 W. RANDOLPH ST., SUITE 2599
CHICAGO, ILLINOIS 60601
(312) 346-4179
(312) 984-1033
OUTSIDE ILLINOIS CALL 1-800-443-7108

REPORTED BY: MARIA MIRAMONTES, CSR

1 APPEARANCES:

2 U.S. ENVIRONMENTAL PROTECTION AGENCY
 3 BY: MR. EDWARD J. KOWALSKI
 4 111 West Jackson, 3rd Floor
 5 Chicago, Illinois 60604
 6 (312) 886-6632

7 ALSO PRESENT:

8 MR. MARK D. THOMAS,
 9 MS. CYNTHIA RUED.

10 * * * * *

11 I N D E X

12	<u>EXAMINATIONS</u>	<u>PAGE</u>
13	WITNESS: YOLANDA TYREE	
14	Examination by Mr. Kowalski	3
15	<u>TYREE DEPOSITION EXHIBITS</u>	<u>PAGE</u>
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1 (Witness sworn.)

2 YOLANDA TYREE,

3 after having been first duly sworn, was examined and
4 testified as follows:

5 EXAMINATION

6 MR. KOWALSKI:

7 Q Okay. Would you please state your full
8 name, and spell your last name for the record?

9 A Yoland Tyree, last name, T-y-r-e-e.

10 Q And do you go by the name Lynn?

11 A Lynn is a nickname, right.

12 MR. KOWALSKI: For the record, this will be the
13 deposition of the Yoland Tyree taken pursuant to a
14 subpoena issued under the authority of the Superfund
15 Amendments and Reauthorization.

16 Ms. Tyree, I am going to be asking you
17 some questions today concerning two Superfund sites,
18 one U.S. Scrap site and that's located at
19 approximately 122 Cottage Grove Avenue in the city
20 of Chicago, Illinois. The other site I will refer
21 to is the 9th Avenue Dump or 9th Avenue site, and
22 that is located 9th and Cline Avenue in Gary,
23 Indiana.

24 If at any time you don't understand

1 any of my questions or would like further
2 explanation, interrupt me and ask me, and I will be
3 happy to explain or re-ask the question for you. If
4 you answer a question, I will assume that you
5 understood it and you answered truthfully.
6 Understood?

7 THE WITNESS: Understood.

8 MR. KOWALSKI: Okay. The other thing is that
9 the court reporter will be taking your testimony
10 today and in ordinary conversation we have a
11 tendency to shake our head no or nod it yes, and she
12 can't take those down. That will be a blank on the
13 record. So, I ask that you keep all your answers
14 out loud.

15 THE WITNESS: Okay.

16 BY MR. KOWALSKI:

17 Q Could you give me your current address,
18 please?

19 A 2741 South Archer.

20 Q And that's in Chicago?

21 A Yes.

22 Q And how long have you lived there?

23 A A little over a year.

24 Q Is that a house or apartment?

1 A Apartment.

2 Q Do you have any current plans on moving in
3 the near future?

4 A We are thinking of it, yes.

5 Q Have you made any decision on where you may
6 go?

7 A Probably stay in the neighborhood.

8 Q Is there anyone I could contact, in the
9 event you moved, to get your new address?

10 A Yes, you could contact Gene Scudierie.

11 Q Could you spell that last name?

12 A Can you spell it?

13 MS. RUED: S-c-u-d-i-e-r-i-e.

14 BY MR. KOWALSKI:

15 Q And where does she reside?

16 A 3006 South Quinn.

17 Q I am sorry.

18 A South Quinn.

19 Q Quinn, and that's in Chicago?

20 A Yes.

21 Q And do you know her phone number?

22 A 225-1675.

23 Q And she's a friend of yours?

24 A Yes.

1 Q Are you currently employed?

2 A Yes, I am.

3 Q Where is that?

4 A Maaco Auto Body.

5 Q And where is that located?

6 A 5050 South Pulaski.

7 Q And that's in Chicago?

8 A Yes.

9 Q And what is your job position there?

10 A I am the supervisor.

11 Q And how long have you been there?

12 A Seven months.

13 Q And where did you work prior to that?

14 A S & S Auto Delivery.

15 Q And where are they located?

16 A 700 North Ashland -- 1700 North Ashland.

17 Q And, again, that's in Chicago?

18 A Yes.

19 Q And what was your job there?

20 A Driver.

21 Q And how long were you employed there?

22 A About a year or two.

23 Q And prior to that, where were you employed?

24 A I worked for -- I can't think of the name.

1 Health Developmental Center.

2 Q Where are they located?

3 A 183rd and Harlem.

4 Q And what was your job there?

5 A I took care of patients and stuff like
6 that.

7 Q And how long did you work there?

8 A A year.

9 Q What was your furthest schooling in
10 education?

11 A First year high.

12 Q And that was in the Chicago area here?

13 A No, I went to school in Ohio, Maumee, Ohio.

14 Q And what was the name of the high school?

15 A Mary Brook.

16 Q Pardon me. I see we are competing with
17 some fans or something, if you could keep your voice
18 up to the extent that you can.

19 And have you had any formal education
20 since high school?

21 A Just, you know, crafts and stuff like that.

22 Q At some period of time, were you employed
23 at U.S. Scrap Corporation?

24 A Yes. I was.

1 Q When did you begin to work there?

2 A 1972.

3 Q And when did you end that employment?

4 A In '75 or '76.

5 Q And after you left U.S. Scrap, where did
6 you go?

7 A I went with the company he sold it to for
8 about three months.

9 Q And when you say "he" you mean Mr. Martel?

10 A Yes, I do.

11 Q Do you recall the name of that company?

12 A Not offhand, I don't.

13 Q Do you recall the owner of the company?

14 A No, I don't.

15 Q Was it a Mr. Josephic?

16 A Yes, it was.

17 Q Is the name of the company Liquid Waste, if
18 you recall?

19 A Yes, it was.

20 Q And when you worked for that company, where
21 were you located?

22 A In Franklin Park.

23 Q And you left that employment after about
24 three months?

1 A Yes.

2 Q Where did you go then?

3 A I worked for Western Traffic for about six
4 months.

5 Q Where are they located?

6 A They were located in McCook, Illinois.

7 Q They have since moved or gone out of
8 business?

9 A They moved.

10 Q Where are they located then?

11 A I believe on Cicero, somewhere.

12 Q In Chicago?

13 A I am not sure if that's Chicago or not.

14 Q What was your job at Western Traffic?

15 A Sometimes I drove, sometimes I put flashing
16 lights together.

17 Q I am unfamiliar with them. What kind of
18 business are they in?

19 A They were the ones who put the barricades
20 up on the expressways.

21 Q I see. Okay. And after you left Western
22 Traffic, who was your next employer?

23 A I worked for Arco Dorothy.

24 Q And where was that located?

1 A 701 West 60th.

2 Q And what kind of job did you do there?

3 A I was a material handler.

4 Q What kind of business is Arco Dorothy?

5 A They made plastic.

6 Q And how long were you employed there?

7 A Five years.

8 Q Other than the period of time you spent
9 with Mr. Martel and with the company he sold U.S.
10 Scrap to, have you been employed at all in the waste
11 disposal industry?

12 A No.

13 Q What was your employment prior to you
14 getting work at U.S. Scrap?

15 A I worked for Thunderbird Catering.

16 Q Can you explain the circumstances by which
17 you came to become employed at U.S. Scrap?

18 A A friend of mine used to go out there,
19 worked for the catering outfit, also, and they were
20 saying they needed somebody to answer the phones
21 and, you know, stuff. So, I decided to go there
22 instead of staying at Thunderbird.

23 Q And that was in approximately 1972?

24 A Right.

1 Q Do you recall what time of year?

2 A It was June, I believe.

3 Q And who employed you?

4 A Bob.

5 Q Baich?

6 A Baich, right.

7 Q And what kind of job duties did you have at
8 U.S. Scrap?

9 A When I first started out, I just answered
10 the phones. And later on, I started dispatching the
11 trucks and stuff.

12 Q Could you explain a little bit for me the
13 layout of the operations when you first started work
14 there?

15 A When you went in, you went like down and
16 around, there was a trailer and like a little shed,
17 and then behind the shed, there was like a little
18 dock with a hole in front of it where we would --
19 they would dump drums and stuff like that. And
20 then, again, as you come in, there was a road that
21 went off the other way that they would take the
22 trucks to and dump the liquid from the trucks.

23 Q Is it correct that the facility was located
24 in the area of 122nd and Cottage Grove?

1 A Yes.

2 Q And as I understand it, it ran, generally,
3 lengthwise north to south, is that correct?

4 A Correct.

5 Q And the western boundary was bordered by a
6 railroad track?

7 A Yes, on one side there was a railroad
8 track.

9 Q Okay. And the entrance road or gate, was
10 that located on the northern portion of the site?

11 A Yes.

12 Q Viewing the facility in a north/south
13 direction, where was the trailer located? Would
14 that be more toward the north or more toward the
15 south of the site?

16 A I would say the center of the site.

17 Q And that was a house trailer type of
18 building?

19 A Yes.

20 Q And what was that building used for?

21 A Telephone answering. .

22 Q Were any documents kept there?

23 A No, there was an office down the road from
24 there.

1 Q Okay. Was that 391 East Kensington?

2 A Right.

3 Q Ms. Tyree, your subpoena for deposition
4 requested that you bring any records you had in your
5 position related to these two sites. Do you have
6 any such records?

7 A I used to have a card file with all of the
8 customers that we had, but I couldn't tell you what
9 happened to it.

10 Q Was that card file something you kept in
11 the course of business while you worked at the U.S.
12 Scrap facility?

13 A Yes.

14 Q And did you still have that file when you
15 left the business, when you left the corporation?

16 A Yes, I did.

17 Q And you kept that at home?

18 A Yes, I did.

19 Q When was the last time you saw that?

20 A God, couple years ago I would say.

21 Q And do you recall where you saw it?

22 A It was in an apartment I used to live in.

23 Q Did you keep it in some kind of storage
24 box?

1 A It was in a little brown file box.

2 Q And you have since moved from that
3 apartment?

4 A Yes.

5 Q Did you take it with you to your new
6 apartment?

7 A I really don't recall if I did or not.

8 Q Have you ever made an intentional effort
9 since last seeing that file to find it again?

10 A No, I haven't.

11 Q Could I ask you when you go home, to make a
12 serious effort to find that file for me?

13 A Certainly.

14 Q Were those index card type documents?

15 A Yes, they were.

16 Q And did you prepare those initially, or did
17 someone else prepare those?

18 A I prepared some and somebody else prepared
19 some.

20 Q Who prepared the rest?

21 A I believe Bob Baich prepared some.

22 Q What kind of information was on those
23 cards?

24 A The name of the company, the address, phone

1 number, stuff like that, what township they were in.

2 Q Did those cards indicate waste type from
3 the customer?

4 A I don't believe so.

5 Q When were those prepared?

6 A Oh, gosh. I guess back in the latter part
7 of '72, '73.

8 Q Did you -- or do you still have any other
9 documents related to either of these two sites?

10 A No, I do not.

11 Q During the course of business operations at
12 the site when you first started there, who would
13 work in this trailer?

14 A When I first started there?

15 Q Yes.

16 A There was just Bob and myself.

17 Q And then over the course of time, would
18 additional people be working there?

19 A No, actually they were working on the
20 grounds, but not inside the trailer.

21 Q Did Steve ever work in the trailer?

22 A Occasionally he would come, yes.

23 Q And what would he do in there?

24 A Just see how things were going.

1 Q Did David Hed work in the trailer?

2 A David, I believe he is the one who worked
3 in the office. Elderly man?

4 Q Yes.

5 A Right. I believe he worked in the office.
6 He came down occasionally but never really did
7 anything down there.

8 Q Okay. And you said there was a shed next
9 to the trailer, is that correct?

10 A Kind of behind the trailer, yes.

11 Q And what was that shed used for?

12 A They had some stuff in there -- I am not
13 sure -- like equipment or something like that, and
14 they kept some dogs in there.

15 Q What was the purpose of the dogs?

16 A To watch the grounds.

17 Q Okay. And the dock with the hole in front,
18 where was that located?

19 A The trailer was like this, going east and
20 west, okay (indicating)? And then there was a shed
21 here and the dock was kind of like in an angle form.

22 Q Okay. So the dock was angled in an
23 east/west direction behind the trailer and behind
24 the shed, is that correct?

1 A Right.

2 Q So, that would be to the south of the
3 trailer and shed?

4 A It would be to the north.

5 Q To the north. So, when you say, "The shed
6 was behind the trailer," it was actually to the
7 north of the trailer?

8 A Right.

9 Q Okay. And this dock was used for dumping
10 drums, is that correct?

11 A Correct.

12 Q And, as I understand it, the truck would be
13 pulled up to the dock, the drums would be unloaded
14 and the contents would be disposed of in this hole?

15 A Correct.

16 Q Was there a tank in the ground, in that
17 hole, or was it just open ground?

18 A I think it was just ground.

19 Q What was the size of that hole, if you
20 could approximate for me?

21 A Approximately, the size of this table.

22 Q Okay. Say 20 feet by 4 feet?

23 A Something like that.

24 Q Did the dimensions of that hole ever

1 change? In other words, was it ever widened or
2 altered?

3 A Sometimes it was moved.

4 Q Okay. So, the hole would move?

5 A They would like cover up where they were
6 dumping there and then move the hole over one way or
7 the other to be able to put more in there.

8 Q Would they then move the dock to the new
9 hole?

10 A Yes.

11 Q Would the hole dimensions remain relatively
12 the same?

13 A Basically, yes.

14 Q Okay. During the time you worked out
15 there, how many of these holes would be dug?

16 A Oh, I would say there were two of them.

17 Q And were they basically in the same area?

18 A Yes.

19 Q Were there also some old grain silos on
20 site?

21 A Yes, there were.

22 Q Where were those located?

23 A Directly in front of the trailer.

24 Q So that would be to the south of the

1 trailer?

2 A Right. There was a building there, too,
3 now that you mention it.

4 Q And was that building or silos used for
5 anything by the operations?

6 A The silos weren't, but the building was.

7 Q And what was that used for?

8 A They would take some of trucks that had oil
9 and stuff and dump in there.

10 Q As far as you know, was there any
11 delineation made as to what kind of waste would be
12 dumped in that building?

13 A By delineation, do you mean variation of
14 chemical?

15 Q Yes, one kind of waste as opposed to
16 another which would go somewhere else?

17 A Yeah, they worked like -- okay. Sara Lee
18 or something like that they wouldn't put in there
19 because it smelled too bad. They would use like oil
20 or acids and stuff like that that they would put in
21 there.

22 Q There was also, I believe, an incinerator
23 on this site?

24 A Right.

1 Q Where was that located compared to the rest
2 of these buildings?

3 A Okay. The silos were this way in front of
4 the trailer and just off to the right of the silos
5 was this incinerator.

6 Q So, using north, east, west and south, the
7 incinerator would be to the west of the silos?

8 A Right.

9 Q You also said there was a road off the
10 other way where liquid would be dumped out of the
11 trucks?

12 A It was kind of -- you would go east to --
13 there was a building or a silo or something on that
14 property, too. And they would dump over there.

15 Q Do you recall if that building had a name?

16 A No, I don't.

17 Q Did you ever hear it referred to as a
18 Garvey grain elevator?

19 A No, I have not.

20 Q But the liquid was dumped in the area of
21 another building with grain silos?

22 A It was either a building or grain silos,
23 yes.

24 Q And that was actually off the site, off the

1 one piece of property, is that correct?

2 A Right.

3 Q The U.S. Scrap operations hauled both drum
4 waste as well as bulk tank waste, is that correct?

5 A Correct.

6 Q Where were the tank wastes disposed of?

7 A Either in the building in front of the
8 trailer or over along that road or sometimes even on
9 the road.

10 Q Was any of it ever dumped in that hole
11 where you had talked where the drum waste was
12 deposited?

13 A No.

14 Q Was bulk ever dumped anywhere else on the
15 site itself?

16 A Yes, sometimes.

17 Q Would that be dumped in anywhere in
18 particular or where there was an open spot?

19 A When you come -- There was like a little
20 hill and you had to come around, and they would dump
21 right there, at that little hill.

22 Q So that would be the north portion of the
23 facility?

24 A Right.

1 Q At some point in time, Mr. Martel also
2 began hauling waste to another site, the one at 9th
3 and Cline Avenue in Gary, are you familiar with
4 that?

5 A Yes, I am.

6 Q Was that site operating when you first
7 started at U.S. Scrap?

8 A No.

9 Q Do you know when the first waste was taken
10 out to that site?

11 A I would say a year after I started working.

12 Q So that would be somewhere probably spring
13 or summer of '73?

14 A Right.

15 Q And was waste taken out to the 9th Avenue
16 site for the remainder of the time that you worked
17 for the U.S. Scrap operation?

18 A Yes.

19 Q So that would be until 1975 or '76. Okay.
20 Was there any distinction made as to what kind of
21 waste would be taken to the 9th Avenue site as
22 opposed to U.S. Scrap when both sites were accepting
23 waste?

24 A No.

1 Q Is it correct to say that, depending on
2 circumstances a particular generator's waste could
3 have gone to either site on any given day?

4 A Yes.

5 Q Okay. You have discussed yourself, Bob
6 Baich and David Hed. Other than those individuals,
7 were there any other employees who worked in the
8 office during the time you worked at U.S. Scrap?

9 A Bob Thompson did.

10 Q Bob went into the office after Bob Baich
11 left, is that correct?

12 A For a while, yes.

13 Q Prior to that, he had been a truck driver?

14 A Yes.

15 Q Anyone else other than Bob Thompson?

16 A Earl Klepsur.

17 Q And Earl was a mechanic out at the site?

18 A Right.

19 Q And did he work -- What did he do in the
20 office?

21 A Sometimes he would answer the phones and
22 stuff.

23 Q Was there a certain period of time he did
24 that?

1 A No, not really. Sometimes if somebody was
2 out and he was there, he would answer the phone.

3 Q So, as opposed to some kind of promotion or
4 job change, he would just do it when they needed
5 help up there, basically?

6 A Right.

7 Q Anyone else who worked in the office?

8 A Not that I can remember.

9 Q In addition to the office personnel, there
10 were other employees on this site, one of those
11 being the truck drivers, of course?

12 A Right.

13 Q To the best you can recall, can you name
14 some of the truck drivers for me?

15 A There was Bob Thompson -- I just had his
16 name. There was a guy named Floyd, Ronnie
17 MacFarlane. I could picture this guy, but I can't
18 think of his name. I can't think of their names.

19 Q There is LeRoy Brown?

20 A Oh, Red Burrel (phonetic).

21 Q Do you remember someone with the nickname
22 "Water Boy"?

23 A Water Boy? No.

24 Jimmy Pittman, Burrel, there was

1 another Burrel besides Red, I can't remember his
2 first name though. Burke, there was a Burke. I
3 can't remember his first name either. That's all I
4 can remember.

5 Q Do you recall Floyd's last name?

6 A Is it Floyd or Lloyd? Lloyd is his first
7 name.

8 Q Is that his first or last name?

9 A Lloyd I think is his first name. I can't
10 remember his last name.

11 Q Do you stay in touch with any of these
12 individuals?

13 A Well, Bob Thompson and Earl Klepsur.

14 Q Do you know the whereabouts of Lloyd?

15 A No, I don't.

16 Q How about Red Burrel?

17 A Red Burrel is somewhere in Indiana.

18 Q Do you know where he works there?

19 A No, I don't. Last I heard, he was working
20 as a cook somewhere here in Illinois.

21 Q How about Jim Pittman?

22 A He is a preacher here, somewhere.

23 Q And Burke?

24 A That guy was weird. He -- I never really

1 kept track of him.

2 Q Do you know if he is still in the area by
3 any chance?

4 A No. I don't think he lived in Illinois. I
5 think he lived in Indiana.

6 Also, there is another Burrel that was
7 injured on one of the trucks.

8 Q In an explosion?

9 A Right.

10 Q Do you recall which facility that explosion
11 occurred?

12 A Calumet Container.

13 Q Is that in Calumet city?

14 A Give me a minute, and I can tell you.

15 It's -- you get to it by going out to Expressway
16 I-80. I think you get off at Torrence. I think
17 it's still part of Illinois, but, you know -- I
18 could see it, but I can't tell you exactly.

19 Q Okay. Do you recall any other truck
20 drivers other than those you have mentioned?

21 A No, just the three Burrels and all the
22 rest.

23 Q There were three Burrels total?

24 A Right.

1 Q Were they related?

2 A They were all brothers.

3 Q In addition to truck drivers, there were a
4 variety of laborers that come and worked at the
5 site, is that correct?

6 A Correct.

7 Q Do you recall the names of any of those?

8 A There was Steven Pittman, there was another
9 Pittman -- I can't think of his first name -- and
10 Jesus. There were quite a few Mexicans, but I can't
11 remember all their names.

12 Q Do you know where Steve Pittman is these
13 days?

14 A Steve Pittman is also Jimmy Pittman's, the
15 driver, brother.

16 Q Do you know his whereabouts?

17 A No, I don't.

18 Q Do you know where Jesus is these days?

19 A No, I don't know that either.

20 Q As I understand, most of the laborers were
21 migrant Mexican laborers, is that correct?

22 A Yes.

23 Q You also mentioned Earl Klepsur. Other
24 than Earl, were there other mechanics that worked at

1 either of the sites?

2 A This Burke guy did mechanical work, too.

3 Q Anyone else, you can recall?

4 A Bob Baich did work, also.

5 Q Did you yourself ever go to the 9th Avenue
6 site?

7 A Yes, quite a few times.

8 Q In what capacity?

9 A They had a fire up there a couple of times,
10 and I had to go up there and get -- try to get
11 everything straightened out, make sure no one was
12 hurt, try to get the fire out.

13 Q Was there an office building located there?

14 A No.

15 Q Were there any buildings on the site?

16 A As you drove in, there was a house off to
17 your -- If you are going south, the house is to your
18 left as you're going in. And there was a garage on
19 the other side.

20 Q Were either of those buildings used by the
21 operations down there?

22 A The house wasn't, no. I believe people
23 lived there. The garage I think he had some stuff
24 in there. I don't quite remember for sure, though.

1 Q Was anyone stationed out at 9th Avenue
2 station, for want of a better word, on a permanent
3 basis?

4 A There were Mexicans down there dumping and
5 stuff like that.

6 Q Were there any supervisory people down
7 there?

8 A None.

9 Q Were there any other employees at either of
10 the two sites that we haven't mentioned yet, that
11 you can recall?

12 A No, not offhand.

13 Q Did Frank or Steve Churillo work at either
14 of the sites?

15 A Oh, yes, Frank did.

16 Q And which one did he work at?

17 A 9th Avenue.

18 Q Did he work as supervisor of that site?

19 A I guess, you could say he was kind of. He
20 told them what to do and stuff like that.

21 Q And did he operate the heavy equipment at
22 that site?

23 A Yes.

24 Q U.S. Scrap would take its own trucks out

1 and tanks to pick up the waste from most of the
2 generators, is that correct?

3 A Yes.

4 Q And would then bring it back to either the
5 U.S. Scrap or the 9th Avenue site?

6 A Yes.

7 Q Was it ever brought back to the U.S. Scrap
8 site and held in some kind of holding tanks or
9 storage tanks and then transferred to the 9th Avenue
10 site, as you can recall?

11 A We used to have a tank that they would put
12 stuff in and hold it, but I don't recall what
13 happened to it after it sat there for any length of
14 time.

15 Q Would the drivers sometimes go pick up a
16 load, come back, drop the truck off at the yard and
17 take another truck and pick up another load and then
18 during the night someone would take the loaded truck
19 and dispose of the waste?

20 A Yes.

21 Q Were there separate drivers for those two
22 kinds of jobs, to pick up at the generators and dump
23 the waste?

24 A Sometimes, sometimes no.

1 Q How many trucks did U.S. Scrap use while
2 you were there?

3 A That actually were on the road?

4 Q Yes.

5 A Let's see. There was a 5600, 45 -- Oh, I
6 would say four.

7 Q And how many trailers or tankers?

8 A Oh, that's -- I am sorry. That's the
9 trailers and the tankers, there were four of them.
10 Trucks, he had about five or six.

11 Q What were the sizes of the tankers?

12 A He had a 5600, 52, a 45, and then a small
13 one.

14 Q Did he also have some back hoe units?

15 A Yes.

16 Q How many of those did he have?

17 A One, that I saw.

18 Q Did he also have flatbed or enclosed type
19 of containers or --

20 A He had flatbeds and regular trailers.

21 Q And those were for hauling the drums?

22 A Yes.

23 Q Were there any company names or
24 identifications on any of those tanks or trucks?

1 A I believe it said U.S. Scrap on them.

2 Q Did any of them say anything else, bear any
3 other company names?

4 A Not that I recall.

5 Q Do you recall any bearing the name of
6 Liquid Engineering?

7 A Oh, yeah the back hoes said that.

8 Q Did any of the trucks say U.S. Debarreling
9 or U.S. Drum on them?

10 A I don't recall.

11 Q As I understand it, when a driver -- Well,
12 why don't you tell me from the time you receive a
13 phone call from a customer, what would happen in
14 terms of how the operation would run?

15 Could I get you some water or
16 something?

17 A Please.

18 (Whereupon, a short break was had,
19 after which the preceding
20 deposition continued as follows:)

21 BY MR. KOWALSKI:

22 Q You were going to explain how the operation
23 ran in terms of logistics after a phone call would
24 come in from a customer wanting a pickup?

1 A Okay. We'll get a call, and we would put
2 them, like on a sheet. And if we would have a
3 driver, say in the area, and he was able to pick up
4 what they had, then we would have the driver pick it
5 up. Or we would set it for in the morning that they
6 would -- it would be a full load then the driver
7 would go for the full load.

8 Q Would there be some kind of paperwork made
9 out in connection with the pickup?

10 A I believe there was.

11 Q As I understood it, the driver would
12 receive an invoice or trip ticket with the customer
13 name and possible location on it?

14 A Right. Where it was located and how many
15 gallons there was to pick up.

16 Q He would then take that with him when he
17 made the pickup, have a company official sign it,
18 give them a copy and bring two copies back; is that
19 correct?

20 A That's correct.

21 Q And then those invoices were later
22 collected and taken to the main office, is that
23 correct?

24 A That's correct.

1 Q Did those invoices have any company name or
2 logo on them?

3 A I believe they had U.S. Scrap on them.

4 Q Did any of them have Liquid Engineering on
5 them?

6 A Yes, some of them did.

7 Q Now, would those invoices have U.S. Scrap
8 and Liquid Engineering whether the load eventually
9 went to U.S. Scrap or 9th Avenue?

10 A It didn't make any difference.

11 Q Okay. As far as you are aware, were there
12 any documents or documentation kept indicating which
13 loads went to 9th Avenue as opposed to U.S. Scrap?

14 A None, that I know of.

15 Q So, as I understand, the two sites were
16 basically operating as one operation, is that
17 correct?

18 A Correct.

19 Q Ms. Tyree, if you could now, to the best of
20 your recollection, just name for me the customers
21 that you can recall while you were at U.S. Scrap?

22 A I remember like Sara Lee, Ashland Chemical,
23 Enterprise Wire, Enterprise Paint, Martin Senior --
24 Gosh, there were a lot of them. It's hard to

1 remember.

2 Q Okay. Did you ever work as a driver
3 yourself?

4 A I had a friend that used to come and drive
5 once in a while to one spot, and I would go with
6 him, yeah.

7 THE WITNESS: Do you have a washroom that I can
8 use.

9 MR. KOWALSKI: Certainly.

10

11 (Whereupon, a short break was had,
12 after which the preceding
13 deposition continued as follows:)

14 MR. KOWALSKI: Can you read my last question
15 back?

16 (Record read.)

17 BY MR. KOWALSKI:

18 Q Ms. Tyree, you have mentioned some of the
19 companies you can recall from your memory. If I
20 name some other companies, could that refresh your
21 recollection as to whether they were customers?

22 A Yes.

23 Q Do you recall whether A.E. Staley was a
24 customer?

1 A Staley, no, I don't recall that one.

2 Q Okay. How about Abbott Laboratories?

3 A That one I do recall.

4 Q Do you recall where that facility was
5 located?

6 A No, I don't.

7 Q Do you recall the areas or addresses for
8 some of these facilities?

9 A The ones you named off?

10 Q Those or others that I might ask you of?

11 A Some I may, yes.

12 Q Do you know what kind of waste U.S. Scrap
13 picked up for Abbott Laboratories?

14 A I believe it was acid.

15 Q And do you know whether they were a large
16 account or small account?

17 A I think Abbott was a small account.

18 Q Okay. I am going to be asking you first if
19 you recall the addresses or general locations of
20 these facilities. I am also interested in the kind
21 of waste that was picked up from them, if you know
22 that, and also the size of the account or customer,
23 whether they were a big account or small account.

24 A Okay.

1 Q Do you recall a customer called Active
2 Services Company?

3 A No.

4 Q How about Adolph Plating?

5 A No.

6 Q Alberto Culver?

7 A No.

8 Q Alton Boxboard Company?

9 A No.

10 MR. KOWALSKI: Off the record.

11 (Discussion had off the record.)

12 BY MR. KOWALSKI:

13 Q Do you recall a customer named American Can
14 Company?

15 A Yes.

16 Q Do you know where they were located?

17 A I believe on Western.

18 Q Do you know if there were any other
19 facilities where you picked up other than on the one
20 on Western?

21 A Not that I can recall..

22 Q Do you recall what kind of waste was picked
23 up there?

24 A No, I don't.

1 Q And in terms of size of customer, where
2 would you rank them?

3 A They were a big customer.

4 Q Do you recall whether American Motor
5 Company was a customer?

6 A No, I don't.

7 Q What about a company called American
8 Printers?

9 A No.

10 Q Do you recall a company called Apeco,
11 A-p-e-c-o?

12 A No.

13 Q How about Armor or Wilson Company?

14 A Wilson sounds familiar.

15 Q Do you know where they were located?

16 A No, I don't.

17 Q Do you recall what kind of waste was picked
18 up there?

19 A No, I don't.

20 Q And do you know what size of a customer
21 they were?

22 A No.

23 Q Do you recall a customer called Armstrong
24 Paint or Elliott Paint?

1 A Elliott Paint?

2 Q And do you recall where they were located?

3 A No.

4 Q Do you recall what kind of waste was picked
5 up there?

6 A I believe it was just waste paint.

7 Q And do you know what size of a customer
8 they were?

9 A I would say small.

10 Q Okay. You mentioned Ashland Chemical
11 Company as a customer?

12 A Right.

13 Q Do you recall where that facility is
14 located?

15 A No, I believe there were a couple of them
16 that we went to.

17 Q Okay. You don't recall the locations of
18 either?

19 A No.

20 Q Do you recall what kind of waste was picked
21 up there?

22 A I believe we picked up acid from them.

23 Q And --

24 A They were a big customer.

1 Q Big?

2 A Yes.

3 Q Do you recall a customer called
4 Barber-Green?

5 A No.

6 Q Do you recall a customer called Bagcraft
7 Corporation?

8 A No.

9 Q Barker Chemical?

10 A No.

11 Q Barrett Varnish Company?

12 A No.

13 Q Do you recall any accounts that were out of
14 the state that the drivers would have to make an
15 extra long trip to?

16 A There was a place called Uniroyal.

17 Q And where was that?

18 A Mishawaka.

19 Q And what kind of waste was picked up there?

20 A Very dangerous stuff. That's all I can
21 remember.

22 Q Why do you say that?

23 A Because it started a fire one day.

24 Q At the Uniroyal Plant?

1 A No, at 9th Avenue.

2 Q And what size of account was that?

3 A Very big.

4 Q Do you recall any other out-of-state
5 accounts?

6 A There was one in Rhinelander.

7 Q Rhinelander, Wisconsin?

8 A Yes, but I don't remember what the name of
9 the company was.

10 Q Triumph Twish Drill, does that refresh your
11 recollection at all?

12 A It doesn't sound familiar. I know we did
13 have one.

14 Q Do you know what kind of waste was picked
15 up there?

16 A No, I don't.

17 Q And do you know the size of that account?

18 A For a while it was pretty good.

19 Q Do you recall any other out-of-state
20 accounts?

21 A No, just those two.

22 Q How about in Iowa?

23 A Oh, yes, we did go someplace in Des Moines,
24 I believe it was.

1 Q Do you recall an account in Muscatine, Iowa
2 or Clinton, Iowa?

3 A Clinton, that's it.

4 Q Do you recall the name of that account?

5 A No, I don't.

6 Q Could it have been Collis Company?

7 A Yes, that is it.

8 Q Do you recall --

9 A Collins, isn't it Collins?

10 Q I have Collis, but it could very well be
11 Collins.

12 Do you recall what kind of waste was
13 picked up there?

14 A I believe acid.

15 Q And where did they rank in terms of size of
16 account?

17 A I would say they were fair.

18 Q Do you recall a customer called Benjamin
19 Moore Company?

20 A Yes.

21 Q Do you recall where they were located?

22 A North and 25th.

23 Q And what kind of waste was picked up there?

24 A I believe waste paint.

1 Q And where did they rank in terms of size of
2 account?

3 A They were good.

4 Q When you use the term "good," you mean
5 fairly large?

6 A We would get it quite often.

7 Q Do you recall a customer called Big Ben
8 Chemicals?

9 A No.

10 Q How about Blaw-Knox Foundry?

11 A No.

12 Q Boyle-Midway?

13 A Boyle? I remember Midway.

14 Q Okay. Where were they located?

15 A I am not sure.

16 Q Do you recall what was picked up there?

17 A I think we picked up oil there.

18 Q And where did they rank in terms of size?

19 A They were fair.

20 Q Do you recall a customer called Brandenburg
21 Wrecking Company?

22 A I remember a wrecking company, but I don't
23 remember if that's it.

24 Q How about Brett Ford Manufacturing?

1 A No.

2 Q Brightly Galvanized?

3 A Yes.

4 Q Okay. Do you recall where they were
5 located?

6 A No.

7 Q Do you recall what kind of waste they
8 generated?

9 A Acid.

10 Q And where did they rank in terms of size of
11 account?

12 A They were good.

13 Q Do you recall a customer called Boltmaster?

14 A No.

15 Q How about C.P. Clare?

16 A C.P. sounds familiar, but I don't know if
17 it was Clare.

18 Q How about C.P. Hall?

19 A C. P. Hall, yeah.

20 Q Do you recall where they were located?

21 A No.

22 Q Do you recall what kind of waste they
23 generated?

24 A I believe acid.

1 Q And where did they rank in terms of size of
2 a customer?

3 A They were fair.

4 Q Do you recall the specific amounts or
5 frequency of pickups for any of these companies?

6 A Like some of those were more so than
7 others. Like that one company, I can't remember the
8 name, you said it was -- Ashland Chemical we used to
9 do quite a lot. Okay. Uniroyal we used to do quite
10 a lot, at least once a week.

11 Q Do you recall what size of truck was used
12 to pick up from there?

13 A Usually, as far as Uniroyal was concerned,
14 we would send a trailer because it was always drums.
15 As far as Enterprise Wire, for instance, that was a
16 very good account, and we used to send the 5600
17 truck there. And the other one, Ashland Chemical,
18 sometimes we would send the tanker or sometimes the
19 drum, the flatbed. It would vary.

20 Q If you recall specifics like that, let me
21 know. Other than that, if you can just tell me
22 general size of account, that's fine.

23 As I understand it, U.S. Scrap also
24 had some tankers stationed at some of these

1 companies, is that correct?

2 A I believe Enterprise Wire had one, and
3 there were a few others, yes.

4 Q Do you recall a customer called Cargill?

5 A Yes.

6 Q Do you recall where they were located?

7 A No.

8 Q Do you recall what kind of waste?

9 A I think that was acid, also.

10 Q And do you recall anything regarding
11 amounts?

12 A As far as Cargill, no.

13 Q Do you recall what size of customer?

14 A He was -- We didn't get them that often.

15 Q Would you describe that as a small account?

16 A I would say fair, yeah.

17 Q Do you recall a customer called Central Can
18 Company?

19 A No.

20 Q How about Central Solvents and Chemicals?

21 A No.

22 Q Do you recall a customer called Chase
23 Products or Chase Brass?

24 A Chase Products sounds familiar.

1 Q Do you recall where they were located?

2 A No.

3 Q Do you recall what kind of waste was picked
4 up from them?

5 A I think acid.

6 Q And do you recall the size of account?

7 A No.

8 Q Do you recall a customer called Chicago
9 Decal?

10 A I have heard the name before, but I don't
11 know if it's because of that or --

12 Q Okay, fair. Do you recall a customer
13 called Chicago Name Plate?

14 A Yes.

15 Q Do you recall where they were located?

16 A No.

17 Q Do you recall what kind of waste they
18 generated?

19 A Acid, I believe.

20 Q Do you recall what size of customer they
21 were?

22 A I believe they were, you know, not -- We
23 didn't get them -- We would get them maybe once a
24 week.

1 Q Some of these you remember the kind of
2 waste they generate; for example, acid. Is there
3 any reason or anything that makes you recall some
4 but not others?

5 A Because if I remember it was a customer
6 that we dealt with quite a lot, okay, and I was the
7 one that wrote out the sheets to give them to the
8 drivers.

9 Q I see.

10 A You know, I would take the calls, and I
11 would write out the sheets and give them to the
12 driver and send off the drivers to where they were
13 going. Some I can remember fairly well, some I
14 can't.

15 Q Okay. Do you recall the names of any of
16 the individuals you dealt with either over the phone
17 or in person from any of these companies.

18 A Gosh, I only remember one guy, and that was
19 at Sara Lee. And he was like a maintenance man or
20 something. His name was Rich, but he was a very
21 pleasant man so you couldn't help but remember him.

22 Q Do you recall Chicago Northwestern Railroad
23 being a customer?

24 A No, I don't.

1 Q How about Chicago Steel & Wire?

2 A Yes.

3 Q Do you recall where they were located?

4 A No, I don't.

5 Q Do you recall what kind of waste they
6 generated?

7 A Acid.

8 Q And do you recall what size of customer
9 they were?

10 A They were pretty good.

11 Q Do you recall a customer called Chicago
12 Rawhide?

13 A No.

14 Q How about Chrome-Rite?

15 A No.

16 Q Chicago Rotoprint?

17 A No.

18 Q Chicago Sheepskin?

19 A For some reason it sounds familiar but --

20 Do you have another name that they went under? Was
21 it only Sheepskin?

22 Q That's the only one I have. It was located
23 around the stockyards.

24 A It does sound very familiar but --

1 Q How about Clark Equipment?

2 A I know the name, but I don't recall.

3 Q How about Clark Oil?

4 A Yes.

5 Q Do you recall where they were located?

6 A Right here on Kedzie and 132nd.

7 Q And do you recall what kind of waste they
8 generated?

9 A Oil.

10 Q And what size customer were they?

11 A A very big one.

12 Q Do you recall a customer called Coldwell
13 General?

14 A No.

15 Q How about Commander Packaging?

16 A No.

17 MR. KOWALSKI: We will take a short break.

18 (Whereupon, a short break was had,
19 after which the preceding
20 deposition continued as follows:)

21 BY MR. KOWALSKI:

22 Q Ms. Tyree, I am going to show you a 16-page
23 document made out on numbered graph paper, the first
24 page of which is headed "Spot tank to load now cost

1 \$35," and what appears to be D. E. Hed, and ask you
2 if you have ever seen that document before?

3 A Yes, I have.

4 Q Okay. Can you tell me what it is?

5 A It keeps a record of the customers and what
6 we picked up and stuff like that, how much, dates
7 and stuff like that.

8 Q I am going to have the court reporter mark
9 on the back Tyree Deposition Exhibit No. 1 for
10 identification.

11 (Whereupon, Tyree Deposition
12 Exhibit No. 1 was marked for
13 identification.)

14 BY MR. KOWALSKI:

15 Q Can you tell me whose handwriting that is
16 on there?

17 A I am not sure. It could be Bob's, or it
18 could be Steve's.

19 Q Okay. The left-hand column where it's
20 entitled "Customer," that would be the U.S. Scrap
21 customer?

22 A Correct.

23 Q And the next column over where it says
24 "First price," what would that indicate?

1 A What they paid per gallon.

2 Q Okay. And how about the second column
3 where it says "Price"?

4 A It could be that they raised the price.

5 Q I see. And the third column where it says,
6 "Service started"?

7 A That's when I -- we first started doing
8 business with them.

9 Q And the final column where it says, "Date
10 raised," what would that mean?

11 A I am not sure.

12 Q Okay. Could that be the date the price was
13 raised?

14 A Possibly.

15 Q And this kind of record was kept by whom?

16 A Sometimes it was kept by us at the office,
17 or sometimes it was kept -- mostly kept at the main
18 office.

19 Q Okay. Looking at Page 2 or even Page 1 in
20 the far left-hand margin, there are some -- what
21 appears to be the letter R. Do you know what that
22 means?

23 A No, I don't.

24 Q I am going to show you another document,

1 Ms. Tyree, simply entitled "Agreement" that appears
2 to represent an agreement between Liquid
3 Engineering, U.S. Scrap, Steve Martel and a company
4 called Liquid Waste, Inc., and I will ask you if you
5 have ever seen that document before?

6 A I believe I have seen this.

7 Q Okay. And can you tell me what that
8 document is?

9 A I believe something as far as merging with
10 U.S. Scrap and Liquid Waste.

11 Q Okay. You will notice the last couple of
12 pages of that document appear to be a list of
13 customers?

14 A Yes.

15 Q Okay. Do you recall those as being U.S.
16 Scrap customers?

17 A Yes.

18 Q Okay.

19 A I do remember the customers now.

20 Q And that was the -- That agreement was when
21 Mr. Martel sold his business to Liquid Waste after
22 which you went to work for Liquid Waste for a few
23 months, is that correct?

24 A Correct.

1 Q Were you involved in any capacity in
2 drafting that agreement or the customer list
3 attached to it?

4 A No, I was not.

5 Q Do you know who was?

6 A I recall a gentleman. I can't remember his
7 name. Elderly -- gee, he used to take me out to
8 lunch at the time all of that was going down, and he
9 would ask me questions as far as the customers were
10 concerned, if they were good customers or bad
11 customers or whatever.

12 Q Do you know if that elderly gentleman was a
13 U.S. Scrap employee or Liquid Waste employee?

14 A He was a Liquid Waste employee.

15 Q Okay. And you don't know who that was?

16 A For some reason the name Fred sticks in my
17 head, but I am not quite sure.

18 Q Going back to customers for U.S. Scrap, do
19 you recall a customer called Container Corporation?

20 A No.

21 Q How about Continental Can Company?

22 A We had a couple of can companies, but I
23 know American Can and National Can, but I am not
24 sure. I think Continental Can, too.

1 Q Would it help if I gave you the facility
2 addresses?

3 A Sometimes, yes.

4 Q This would be located in Bedford Park,
5 Chicago and a plant in Millwaukee?

6 A Yes, on Central Avenue.

7 Q Okay. And do you know what kind of waste
8 was picked up from them?

9 A I believe acid.

10 Q And do you recall what size of account they
11 were?

12 A They were a very good account.

13 Q Do you recall a customer called Corn
14 Products Company or C.P.C.?

15 A No, I don't.

16 Q How about Cosden Oil?

17 A No.

18 Q Crescent Company?

19 A No.

20 Q Crown Corkland Seal Company?

21 A Yes.

22 Q Do you recall where they were located?

23 A 31st Street.

24 Q And do you recall what kind of waste they

1 generated?

2 A I believe acid, also.

3 Q And where would you rank them in terms of
4 size?

5 A About medium.

6 Q Do you recall a customer called Colligan
7 Company?

8 A No.

9 Q How about Cuneo Press or Cuneo Press?

10 A No.

11 Q How about Custom Organics?

12 A No.

13 Q Danley Machine Company?

14 A No.

15 Q Dap Ink?

16 A No.

17 Q Daubert Chemical?

18 A No.

19 Q DeMert and Dougherty?

20 A No.

21 Q DeSoto Chemical?

22 A Yes.

23 Q And where were they located?

24 A I can't remember.

1 Q Okay. Do you recall what kind of waste
2 they generated?

3 A Acid.

4 Q And where would you rank them in terms of
5 size of account?

6 A Good.

7 Q Do you remember a customer called Dreeblan
8 Paint?

9 A Dreeblan Paint, yes.

10 Q And where were they located?

11 A I am not sure.

12 Q Do you recall what kind of waste they
13 generated?

14 A Waste paint.

15 Q And where would you rank them in terms of
16 size of a customer?

17 A Good.

18 Q Do you recall a customer called Du Pont?

19 A I believe so.

20 Q Do you recall where they were located?

21 A No.

22 Q Do you recall what kind of waste they
23 generated?

24 A Waste paint.

1 Q And do you recall what size they were?

2 A Fair.

3 Q Do you recall a customer called Echo
4 Products Company?

5 A Yes.

6 Q Do you recall where they were located?

7 A No.

8 Q Do you recall what kind of waste they
9 generated?

10 A I believe they had oil.

11 Q And do you recall what size of customer
12 they were?

13 A Fair.

14 Q Do you recall a customer called Electronic
15 Plating?

16 A No.

17 Q How about Elliott Paint?

18 A Yes, I believe so.

19 Q Do you recall where they were located?

20 A No.

21 Q Do you recall what kind of waste they
22 generated?

23 A Waste paint.

24 Q Do you recall what size of customer they

1 were?

2 A Fair.

3 Q How about a customer called Englander
4 Mattrees Company?

5 A No.

6 Q You had mentioned Enterprise Paint before?

7 A Right.

8 Q Do you recall where they were located?

9 A On Ashland Avenue.

10 Q Do you recall what kind of waste they
11 generated?

12 A Paint.

13 Q And where would you rank them in terms of
14 size of customer?

15 A They were good.

16 Q You had also mentioned Enterprise Wire
17 Company?

18 A Right. On Vermont Avenue, in Blue Island.

19 Q I am curious that you recall that specific
20 street, is there any special reason?

21 A Because I have been there, and I have
22 traveled there often. And I am from the South Side
23 so I know.

24 Q What kind of waste did they generate?

1 A Acid.

2 Q And where would you rank them in terms of
3 size?

4 A Good.

5 Q Do you recall a customer called Felt
6 Products Manufacturing?

7 A Yes.

8 Q Do you recall where they were located?

9 A No.

10 Q Do you recall what kind of waste they
11 generated?

12 A No.

13 Q And do you recall what size they were in
14 terms of customer?

15 A Fair.

16 Q How about a customer called Fiber Bond?

17 A Sounds familiar, but I don't know, you
18 know, if it's from that.

19 Q Do you recall a customer called Flint Ink
20 Company?

21 A Yes.

22 Q Do you recall where they were located?

23 A For some reason I want to think it's out of
24 town.

1 Q Broadview, Illinois?

2 A Right.

3 Q Do you recall what kind of waste?

4 A Ink waste.

5 Q And where would you rank them in terms of
6 size of customer?

7 A Good.

8 Q Do you recall a customer called Frederick
9 H. Levey Ink Company?

10 A No.

11 Q How about Fox Valley Manufacturing?

12 A Yes.

13 Q Do you recall where they were located?

14 A I think Elgin.

15 Q And what kind of waste did they dispose of?

16 A I believe acid.

17 Q And where would you rank them in terms of
18 size?

19 A Good.

20 Q How about Furnas Electric?

21 A No.

22 Q Georgia Pacific Company?

23 A No.

24 Q Glidden Paint Company?

1 A No.

2 Q Good Humor Company?

3 A No.

4 Q Graftec Press?

5 A No.

6 Q Graphon, Incorporated?

7 A No.

8 Q W.F. Hall Printing Company?

9 A No.

10 Q Hanna Waterways?

11 A No.

12 Q Hendrickson Manufacturing Company?

13 A No.

14 Q Heritage Ink?

15 A No.

16 Q Hills-McCanna?

17 A No.

18 Q Hodson Corporation?

19 A No.

20 Q E. F. Houghton Company?

21 A No.

22 Q Hoener-Waldorf?

23 A Yes.

24 Q Okay. Do you recall where they were

1 located?

2 A I believe on Pulaski.

3 Q I have them on Route 6 and Young Road in
4 Joliet?

5 A Okay. Yes, there are two out there.

6 Q Do you recall what kind of waste they
7 generated?

8 A No, I don't..

9 Q Do you recall what size of a customer they
10 were?

11 A They were fair.

12 Q How about Hotpoint, division of G.E.,
13 General Electric?

14 A I don't recall them.

15 Q Howell Company?

16 A No.

17 Q Do you recall some company that made
18 furniture in St. Charles?

19 A No.

20 Q How about a company called Hunt and Wesson?

21 A No.

22 Q How about a company called International
23 Minerals and Chemicals or I.M.C.?

24 A No.

1 Q I.T.T. Harper Corporation?

2 A No.

3 Q Illinois Bronze Coatings?

4 A That sounds familiar.

5 Q Do you recall where they were located?

6 A No.

7 Q Do you recall what kind of waste?

8 A I think acid.

9 Q And where would you rank them in terms of

10 size?

11 A Fair.

12 Q Do you recall a customer called Industrial

13 Hard Chrome?

14 A No.

15 Q How about Institute of Gas Technology?

16 A Yes, I have heard of them.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall what kind of waste they

20 generated?

21 A I think oil.

22 Q And where would you rank them in terms of

23 size?

24 A Fair.

1 Q How about Interlake Steel Company?

2 A They are located in -- just before
3 Roseland.

4 Q It says Riverdale.

5 A That's what I mean, Riverdale, yes.

6 Q Do you recall what kind of waste they
7 generated?

8 A Oil.

9 Q And where would you rank them?

10 A I would also say that we got some acid from
11 them, too.

12 Q Do you recall U.S. Scrap cleaning up a
13 spill on the river near that facility?

14 A Yes.

15 Q And where would you rank them in terms of
16 size?

17 A They were good.

18 Q Do you recall International Harvester
19 Company being a customer?

20 A Yes, on Mannheim Road, if I am not
21 mistaken.

22 Q And do you recall what kind of waste they
23 generated?

24 A I believe acid.

1 Q And where would you rank them in terms of
2 an account?

3 A Good.

4 Q Do you recall a customer called
5 International Mutli Foods or I.M.F.?

6 A No.

7 Q How about Illinois Tool Works?

8 A Yes, I think so.

9 Q Do you recall where they were located?

10 A No.

11 Q Do you recall what kind of waste they
12 generated?

13 A I believe oil.

14 Q And what about size?

15 A Fair.

16 Q Do you recall a customer called J.H. Hubert
17 or J.M. Hubert?

18 A J. M. Hubert.

19 Q Do you recall where they were located?

20 A No.

21 Q Do you know what kind of waste they
22 generated?

23 A I think oil.

24 Q And where would you rank them in terms of

1 size?

2 A Fair.

3 Q Do you recall a customer called Janette and
4 Company?

5 A Yes, I do.

6 Q Where were they located?

7 A I am not sure.

8 Q Do you recall what kind of waste they
9 generated?

10 A I believe acid.

11 Q How about size?

12 A Good.

13 Q Do you recall a customer called Jett Dye
14 Castings?

15 A No.

16 Q How about Jewel Paint Company?

17 A No.

18 Q Jones and Cleary Roofing Company?

19 A No.

20 Q You mentioned Kitchens of Sara Lee earlier.
21 Do you recall what kind of waste they generated?

22 A I don't know how you describe that. It was
23 like waste food.

24 Q Do you recall anything other than food

1 waste?

2 A No, not offhand.

3 Q Okay. Do you recall a customer called Lake
4 River Terminals?

5 A No.

6 Q How about LaSalle Management Company or
7 LaSalle National Bank?

8 A No.

9 Q Leavitt Tube Company?

10 A Yes.

11 Q Do you recall where they were located?

12 A No.

13 Q Do you recall what kind of waste they
14 generated?

15 A Oil.

16 Q Where did they rank in terms of size?

17 A Fair.

18 Q How about a company called Libby MacNeal,
19 Libby?

20 A Libby Foods, yes.

21 Q And what kind of waste did they generate?

22 A Something, basically, the same as Sara Lee.

23 Q Again, it was limited to food waste, as far
24 as you know?

1 A As far as I can remember, yes.

2 Q How about Lindblum High School?

3 A No.

4 Q Lawter Chemical Company?

5 A No.

6 Q MacLean-Fogg Company?

7 A Yes, they are in --

8 Q Do you recall where they were located?

9 A Yeah, for some reason I do. They are out
10 north.

11 Q In Mundelein?

12 A Yes, Mundelein.

13 Q Do you recall what kind of waste they
14 generated?

15 A Acid, I believe.

16 Q And where would you rank them in terms of
17 the size?

18 A Good.

19 THE WITNESS: I feel sorry for you guys and your
20 fingers.

21 MS. RUED: Her fingers

22 BY MR. KOWALSKI:

23 Q How about a customer Magee Chemical or
24 Magee Chemical?

1 A Magee Chemical.

2 Q Do you recall where they were located?

3 A No.

4 Q Do you recall what kind of waste they
5 generated?

6 A Acid.

7 Q And where would you rank them in terms of
8 size of an account?

9 A Good.

10 Q How about Marathon Oil Company?

11 A No.

12 Q You had mentioned Martin Senour Paint
13 Company. Do you recall where they were located?

14 A Yes, they are on Archer.

15 Q And what kind of waste did they generate?

16 A Waste paint.

17 Q And where would you rank them?

18 A Between fair and good.

19 Q How about a company called Matherson,
20 Selig?

21 A No.

22 Q How about McGraw Edison.

23 A No.

24 Q Midwest Brass?

1 A Midwest Brass.

2 Q Do you recall what kind of waste they
3 generated?

4 A Acid, I believe.

5 Q Do you recall where they were located?

6 A No.

7 Q And where would you rank them?

8 A Good.

9 Q How about Midwest Wrecking?

10 A That sounds familiar.

11 Q Mobile Company?

12 A No.

13 Q Monsanto?

14 A Yes.

15 Q Do you recall where they were located?

16 A For some reason I think they were north,
17 also.

18 Q Does Muskatene, Iowa ring a bell?

19 A Yes.

20 Q Do you recall what kind of waste they
21 generated?

22 A Acid.

23 Q And where would you rank them in terms of
24 size?

1 A Good.

2 Q How about a company called Morton
3 Chemicals?

4 A Yes.

5 Q Do you recall where they were located?

6 A No.

7 Q How about what kind of waste they
8 generated?

9 A Acid.

10 Q And where would you rank them in terms of
11 the size?

12 A Good.

13 Q Do you recall a company called Motive
14 Industries?

15 A Yes.

16 Q And do you recall where they were located?

17 A No.

18 Q How about kind of waste they generated?

19 A I believe it was acid.

20 Q Where would you rank them in terms of size?

21 A Good.

22 Q Do you recall a customer called Motorwheel
23 Corporation?

24 A No.

1 Q How about Nalco Chemical, N-a-l-c-o?

2 A No.

3 Q Namsco?

4 A No.

5 Q Nashua?

6 A No.

7 Q National Can Company, I believe you did.

8 A Yes, there were a couple. One was on
9 Western.

10 Q American Can had a facility on Western and
11 one on Ashland. Are you sure you're not confusing
12 the two?

13 A Ashland, I am sorry.

14 Q Do you recall a facility in Summit,
15 Illinois,
16 or LaPorte, Indiana?

17 A LaPorte, yes.

18 Q Do you recall what kind of waste they
19 generated?

20 A I believe it was acid.

21 Q And where would you rank them in terms of
22 size?

23 A Good.

24 Q Do you recall a customer called National

1 Precision Circuits?

2 A No.

3 Q Do you recall a customer called National
4 Steel Container?

5 A No.

6 Q National Wrecking Company?

7 A It seems to me that National did some
8 dumping for us, yes.

9 Q When you say they did some dumping for you,
10 what do you mean?

11 A Well, see, they would have some companies
12 come in, some wrecking companies, and dump stuff
13 there, I guess, to kind of, you know, level the
14 ground out or to, you know, get these --

15 Q Would that be dry rubbish kind of dumping?

16 A Right.

17 Q Do you recall U.S. Scrap hauling any waste
18 for the U.S. Government Nike Silo Sites?

19 A No, I don't..

20 Q How about Outboard Marine Company?

21 A No.

22 Q P.P.G. Industries?

23 A No.

24 Q Penn-Dixie Steel?

1 A No.

2 Q Pierce-Stevens Chemical Company?

3 A No.

4 Q Pittsburg Metals?

5 A No, Pittsburg Steel.

6 Q Pittsburgh Metals?

7 A No.

8 Q How about Precision Twist Drill Company?

9 A No.

10 Q Prefinished Metals.

11 A No.

12 Q Premier Paints?

13 A No.

14 Q Proler-Chicago?

15 A No.

16 Q R. A. Briggs?

17 A Yes.

18 Q Do you recall where they were located?

19 A No.

20 Q Do you recall what kind of waste they
21 generated?

22 A It's hard to tell with Briggs because
23 sometimes they would bring stuff into us, too.

24 Q Sometimes they would do their own hauling?

1 A Yes, sometimes they would bring drums to us
2 and stuff like that.

3 Q Okay. And where would you rank them in
4 terms of size?

5 A Good.

6 Q Do you recall a customer called R-Lite
7 Chemical Coatings?

8 A No.

9 Q How about R.R. Donnelly and Sons?

10 A Yes.

11 Q Do you recall where that facility was
12 located?

13 A Right here on Cermak, by the Outer Drive.

14 Q Do you recall a facility in Mattoon,
15 Illinois, too?

16 A Yes.

17 Q Did you also pick up from them?

18 A Yes, we did.

19 Q And what kind of waste did you pick up?

20 A I am not sure on that one.

21 Q How about size of account?

22 A It was good.

23 Q Do you recall a company called Rauland Tube
24 Company, division of Zenith?

1 A Yes, it's Rauland.

2 Q Okay. And where were they located?

3 A I am not sure.

4 Q What kind of waste did they generate?

5 A I am not sure on that either.

6 Q Okay. Where would you rank them in terms
7 of size?

8 A They were a good account.

9 Q How about a company called Reflector
10 Hardware?

11 A No.

12 Q Regal Tube?

13 A Yes.

14 Q Okay. Where were they located?

15 A I have been to Regal Tube, too, over here
16 on 73rd, I think.

17 Q You were there on a pickup?

18 A Yes, a couple of times. They were a very,
19 very good account.

20 Q And what kind of waste did you pick up?

21 A Acid.

22 Q Do you recall a customer called Reichhold?

23 A No.

24 Q Reliance Electric?

1 A No.

2 Q Remington Arms Company?

3 A No.

4 Q Republic Steel Corporation?

5 A Yes.

6 Q Do you recall where they were located?

7 A They are over east.

8 Q Do you recall what kind of waste was picked
9 up there?

10 A Acid and oil, I believe, also.

11 Q And where would you rank them in terms of
12 size?

13 A Good.

14 Q How about a company called Resins, Solvents
15 and Varnishes Company?

16 A No.

17 Q Revere Brass?

18 A No.

19 Q Rex Chain?

20 A No.

21 Q Rexene Polymers?

22 A Yes. They are in Joliet. They were a
23 very, very good account. We picked up acid.

24 Q How about a company called Richardson

1 Graphics?

2 A No.

3 Q Roper Manufacturing?

4 A No.

5 Q Rust-Oleum?

6 A Yes.

7 Q Do you recall where they were located?

8 A They were up by Evanston.

9 Q And do you recall what was picked up there?

10 A Waste paint, I believe.

11 Q Where would you rank them in terms of size?

12 A Good.

13 Q I always mispronounce this one. Do you
14 recall a company called Scholle Chemical?

15 A No.

16 Q How about Scott, Incorporated?

17 A No.

18 Q Shakeproof?

19 A No.

20 Q Signode?

21 A Signode, yes.

22 Q Do you recall where they were located?

23 A In Bridgeview, I believe.

24 Q And do you recall what kind of waste they

1 generated?

2 A Acid.

3 Q And where would you rank them in terms of
4 size?

5 A Good.

6 Q How about a company called Sigoli Metal
7 Plating?

8 A No.

9 Q Sinclair and Valentine?

10 A Yes.

11 Q Do you recall what kind of waste they
12 generated?

13 A I think we got both from them, acid and
14 oil.

15 Q Do you recall where they were located?

16 A On Pulaski.

17 Q And where would you rank them in terms of
18 size?

19 A Good.

20 Q Do you recall a customer called Size
21 Control?

22 A Yes.

23 Q Do you recall where they were located?

24 A No.

1 Q Do you recall what kind of waste they
2 generated?

3 A Acid.

4 Q And --

5 A They were fair.

6 Q Fair. Do you recall a customer called Skil
7 Power Tool?

8 A No.

9 Q How about Sommer and Maca?

10 A No.

11 Q Specialty Coatings?

12 A No.

13 Q Specified Painting?

14 A No.

15 Q Spot Nails?

16 A Spot Nails, yes.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall what kind of waste they
20 generated?

21 A Acid, I believe.

22 Q And where would you rank them in terms of
23 size?

24 A Good.

1 Q Do you recall a customer called Standard T
2 Chemical?

3 A Yes.

4 Q Do you recall where they were located?

5 A No. I think there are a couple of them
6 that we went to.

7 Q And do you recall with what kind of waste
8 they generated?

9 A Acid.

10 Q And where would you rank them?

11 A Good.

12 Q How about a company called Stauffer
13 Chemical?

14 A I don't remember that.

15 Q Stewart Chemical Paint Company?

16 A Yes.

17 Q Do you recall where they were located?

18 A No.

19 Q Do you recall what kind of waste they
20 generated?

21 A Acid.

22 Q And where would you rank them?

23 A Good.

24 Q Do you recall a customer called Stein-Hall?

1 A Yes.

2 Q Do you recall where they were located?

3 A No.

4 Q Do you recall what kind of waste they
5 generated?

6 A I believe acid.

7 Q And where would you rank them?

8 A Fair.

9 Q How about a company called Stressan-Reuter
10 Company?

11 A No.

12 Q Stuart Oil Company?

13 A No.

14 Q Sun Chemical?

15 A Yes.

16 Q Do you recall where they were located?

17 A No.

18 Q Do you recall if there is more than one
19 plant?

20 A Yes, there was.

21 Q Do you recall if there was one in
22 Northlake?

23 A Yes, there was.

24 Q How about Bedford Park?

1 A Yes.

2 Q Kankakee?

3 A I am not sure about Kankakee.

4 Q Do you recall what kind of waste they
5 generated?

6 A Acid, I believe.

7 Q And where would you rank them?

8 A Good.

9 Q Do you recall a customer called Technical
10 Coating?

11 A No.

12 Q How about Terminal Transport?

13 A No.

14 Q Texaco Company?

15 A No.

16 Q Thompson Heywood Chemical?

17 A Yes.

18 Q Do you recall where they were located?

19 A No.

20 Q Do you recall what kind of waste they
21 generated?

22 A Acid, I believe.

23 Q And where would you rank them in terms of
24 size?

- 1 A Good.
- 2 Q Do you recall a customer called Thor Power?
- 3 A No.
- 4 Q How about Travenol or Baxter Travenol?
- 5 A No.
- 6 Q Triple S Etchants?
- 7 A No.
- 8 Q Triumph Twist Drill.
- 9 A No.
- 10 Q U.S. Envelope?
- 11 A No.
- 12 Q U.S. Reduction Company?
- 13 A No.
- 14 Q U.S. Steel?
- 15 A Yes.
- 16 Q Do you recall where that was located?
- 17 A No, I don't.
- 18 Q Do you recall what waste was hauled?
- 19 A Acid and oil.
- 20 Q And where would you rank them in terms of
- 21 size?
- 22 A Good.
- 23 Q Do you recall a customer called Union Camp?
- 24 A No.

- 1 Q How about United Wallpaper?
- 2 A No.
- 3 Q Val Spar?
- 4 A No.
- 5 Q Vandercook?
- 6 A No.
- 7 Q Velsicol Chemical?
- 8 A The name sounds familiar but --
- 9 Q The name sounds familiar, but you don't
- 10 recall anything else about it?
- 11 A Right.
- 12 Q How about Venus Laboratories?
- 13 A No.
- 14 Q Victor Gasket?
- 15 A Yes.
- 16 Q Do you recall where they were located?
- 17 A No.
- 18 Q Do you recall what kind of waste they
- 19 generated?
- 20 A Oil, I believe.
- 21 Q And where would you rank them in terms of
- 22 size?
- 23 A Good.
- 24 Q How about a company called W.C. Richards?

1 A No.

2 Q William Wrigley Company?

3 A No.

4 Q Warner Electric?

5 A No.

6 Q Warwick Electronics?

7 A No.

8 Q Western Electric?

9 A Yes, it seems to me we did go there.

10 Q Do you recall where that was located?

11 A I think that was out in Evanston, also --

12 No, it's not. I am thinking of a different company.

13 It's not that one. It's on Cicero.

14 Q Right. Do you recall that being a
15 customer?

16 A Yes, I do. I don't recall what we got from
17 there, and it was a fair customer.

18 Q Do you recall Wilson Sporting Goods as
19 being a customer?

20 A Yes.

21 Q Do you recall where they were located?

22 A No.

23 Q Do you recall what kind of waste was picked
24 up from them?

1 A No.

2 Q And where would you rank them in terms of
3 size of an account?

4 A Fair -- good. I am sorry. Good. Wilson
5 was up north somewhere, now that I think about it.

6 Q Do you recall a customer called Witco
7 Chemical?

8 A No.

9 Q Wyco Tool Company?

10 A No.

11 Q Wycoff Steel Company?

12 A That one sounds familiar.

13 Q Do you know where they were located?

14 A No.

15 Q Do you recall what kind of waste you picked
16 up there?

17 A Oil, I believe.

18 Q And where would they rank in terms of size
19 of an account?

20 A Fair.

21 Q Do you recall a customer called Wyman
22 Gordon?

23 A Yes.

24 Q And where were they located?

1 A Next town over from Riverdale.

2 Q Harvey?

3 A Yeah.

4 Q And do you recall what kind of waste they
5 generated?

6 A I believe we got acid and oil from them.

7 Q And where would you rank them in terms of
8 size?

9 A Good.

10 Q Do you recall Xerox Corporation being a
11 customer?

12 A Yes, for some reason.

13 Q Do you recall where they were located?

14 A No.

15 Q Do you recall what kind of waste was picked
16 up there?

17 A I believe acid.

18 Q And where would you rank them in terms of
19 size?

20 A Fair.

21 Q How about a company called Miller Pre-Pared
22 Potatoes?

23 A No.

24 Q Wheting Corporation, W-h-e-t-i-n-g?

1 A No.

2 Q Wilson & Company?

3 A No.

4 Q Ferro Engineering?

5 A No.

6 Q Bulk Terminal Transport?

7 A That sounds familiar.

8 Q That was located at 124th and Stony Island,
9 so it would be near the U.S. Scrap site, if that
10 helps you at all.

11 A I believe it was a quick order for the
12 drivers.

13 Q It would be just the other side of the
14 expressway from the U.S. Scrap site?

15 A Right.

16 Q Do you recall what was generated there?

17 A No.

18 Q Do you recall where they ranked in terms of
19 size of an account?

20 A I would say fair.

21 Q Do you recall a customer called
22 Accutronics?

23 A No.

24 Q How about ACME Steel Company?

1 A Yes.

2 Q They were either related to or renamed from
3 Interlake Steel, is that correct?

4 A I am not sure on that.

5 Q Do you recall what kind of waste was picked
6 up there?

7 A I think acid.

8 Q And where would you rank them in terms of
9 size?

10 A I would say fair.

11 Q Do you recall a customer called Advance
12 Transformer?

13 A No.

14 Q How about Albany?

15 A No.

16 Q Alco-Gravier?

17 A No.

18 Q Allis Chalmers?

19 A Yes. They are located out south, also.

20 Q Also in Harvey?

21 A Yes.

22 Q Do you recall what kind of waste was picked
23 up from them?

24 A I believe oil.

1 Q And where would you rank them in terms of
2 size?

3 A Good.

4 Q Do you recall a company called American
5 Name Plate?

6 A Yes, I do.

7 Q Do you recall where they were located?

8 A No.

9 Q Do you recall what kind of waste was picked
10 up from them?

11 A Acid, I believe.

12 Q And where would you rank them in terms of
13 size?

14 A Fair.

15 Q How about a company called American Printer
16 Magazine?

17 A No.

18 Q American Rivet?

19 A No.

20 Q Anderson Manufacturing?

21 A No.

22 Q APPCO Metal?

23 A No.

24 Q Armstrong Chemicals?

1 A No.

2 Q Avon?

3 A No.

4 Q B & J Plastics Manufacturing?

5 A No.

6 Q Betz Laboratories?

7 A No.

8 Q Boyar Schultz?

9 A Boyar Schultz, yes.

10 Q Do you recall where they were located?

11 A No.

12 Q Do you recall what kind of waste was picked
13 up from them?

14 A I believe acid.

15 Q And where would you rank them in terms of
16 size?

17 A Good.

18 Q How about a company called Bruce Horn?

19 A No.

20 Q Calumet Screw Machine?

21 A No.

22 Q Cellofilm?

23 A Say it again, I'm sorry.

24 Q Cellofilm.

- 1 A No.
- 2 Q Central Scientific?
- 3 A No.
- 4 Q Chem Trust?
- 5 A No.
- 6 Q Chicago Adhesive?
- 7 A No.
- 8 Q Chicago Metals?
- 9 A No.
- 10 Q Chicago Rotoprint?
- 11 A No.
- 12 Q Commercial Solvents?
- 13 A No.
- 14 Q Continental Cleaning?
- 15 A No.
- 16 Q Contour Saws?
- 17 A No.
- 18 Q Cook County Hospital?
- 19 A No.
- 20 Q Koroname?
- 21 A No.
- 22 Q Cullegan Fire Protection?
- 23 A No.
- 24 Q Cuneo Solvents?

1 A No.

2 Q Custom Metals?

3 A No.

4 Q Delaware Plastics?

5 A No.

6 Q Desa Industries?

7 A No, sir.

8 Q Dublin Company?

9 A Du Pont?

10 Q No. It's D-u-b-l-i-n.

11 A No.

12 Q Dutone?

13 A No.

14 Q Elgin Machine?

15 A No.

16 Q Federal Tool and Plastics?

17 A No.

18 Q Ford Motor Company?

19 A No.

20 Q Frank Currau Company?

21 A No.

22 Q Gard Industries?

23 A No.

24 Q Handschy Chemical?

1 A No.

2 Q Hausner Hard Chrome?

3 A No.

4 Q Heat Bath Corporation?

5 A No.

6 Q Hooker Glass?

7 A No.

8 Q SMF, Incorporated?

9 A No.

10 Q Inland Steel Company?

11 A Yes.

12 Q Do you recall where they were located?

13 A I think it was right there in Riverdale.

14 Q And what kind of waste was picked up there?

15 A Acid and oil.

16 Q And where would you rank them in terms of

17 size of an account?

18 A Good.

19 Q Do you recall a customer called Jataglio

20 Service?

21 A No.

22 Q J & S Jin Mill Products Company?

23 A No.

24 Q John L. Armitage?

1 A No.

2 Q Kerr Chemical?

3 A No.

4 Q KMS?

5 A No.

6 Q Lisner?

7 A Lisner sounds familiar.

8 Q Do you recall anything else about it?

9 A I believe we picked up acid from them.

10 Q Do you recall where they ranked in terms of

11 size of an account?

12 A Let's see, about medium.

13 Q Do you recall a customer called Luminous

14 Ceiling?

15 A No.

16 Q Mass & Waldstein?

17 A No.

18 Q Marvel Metal?

19 A No.

20 Q Metal Industry?

21 A No.

22 Q Metal Reclaiming Corporation?

23 A No.

24 Q Midwest Electronics?

1 A No.

2 Q Mirror Reflector Service Company?

3 A No.

4 Q Mobile Oil?

5 A I know we had something to do with an oil

6 company other than Clark Oil, but I don't remember

7 which one it was.

8 Q How about Modine Manufacturing Company?

9 A No.

10 Q Moffet Tech Center?

11 A No.

12 Q National Bronze?

13 A No.

14 Q National Celofilm?

15 A No.

16 Q Northwest Salvage?

17 A No.

18 Q Northwest Screen Print?

19 A No.

20 Q Northwestern University?

21 A No.

22 Q Owens-Illinois or Owens-Corning?

23 A No -- Oh, wait Owens-Illinois, for some

24 reason. We did go there, too.

1 Q Do you recall where they were located?

2 A No, I don't.

3 Q Do you recall what you picked up there?

4 A I believe oil.

5 Q And where would they rank in terms of size?

6 A Fair.

7 Q Do you recall a customer called Parsley

8 Products?

9 A No.

10 Q Penray?

11 A No.

12 Q Pauncher Industries?

13 A No.

14 Q Preheler Electrical?

15 A No,

16 Q Reliable Engineering Service?

17 A No.

18 Q Reliance Universal?

19 A No.

20 Q Rockola Manufacturing?

21 A No.

22 Q Rohn & Hass?

23 A No.

24 Q Role Print Packaging?

- 1 A No.
- 2 Q Samuel G. Keywell?
- 3 A No.
- 4 Q St. Charles Manufacturing?
- 5 A No.
- 6 Q Sherwin Williams?
- 7 A No.
- 8 Q Stenograph?
- 9 A No.
- 10 Q Transport Service?
- 11 A No.
- 12 Q Western Community?
- 13 A No.
- 14 Q Young Spring & Wire?
- 15 A No.
- 16 Q Technical Products?
- 17 A No. There was a railroad that we used to
- 18 go to. It was out by Northlake.
- 19 Q The Chicago Northwestern Railroad?
- 20 A I was thinking about when you said it. We
- 21 went to a railroad, but I couldn't --
- 22 Q It was the Northlake switching yard?
- 23 A Right.
- 24 Q Do you recall what was picked up there?

1 A I believe acid.

2 Q And where would you rank them in terms of
3 size of an account?

4 A Very good.

5 Q I take it your information on the kind of
6 materials picked up as well as your estimate of the
7 companies, ranking in terms of size is based upon
8 your handling of the accounts?

9 A This is true.

10 Q Did you work as a dispatcher your entire
11 time at U.S. Scrap?

12 A No. After about a year and a half, almost
13 two years, Bob decided he didn't want anything to do
14 with it anymore. He left, and then I was in charge.

15 Q So, you were foreman or boss?

16 A More or less, yes.

17 Q For the remainder of the time?

18 A Yes.

19 MR. KOWALSKI: Do you have any questions?

20 MR. THOMAS: No.

21 MR. KOWALSKI: Okay. Ms. Tyree, those were all
22 the questions. As I mentioned earlier, I am going
23 to ask the court reporter to write your deposition
24 up in the form of a transcript or booklet, and you

1 have the right to receive a copy of that and read
2 through it, check it for accuracy, and then sign off
3 on it; or you can do what's called waiving signature
4 if you trust that the court reporter took your
5 testimony down accurately. Which of those do you
6 care to do?

7 THE WITNESS: I don't know. Off the record, if
8 it's okay.

9 MR. KOWALSKI: Sure. Off the record.

10 (Off the record.)

11 MR. KOWALSKI: On the record. Okay you care to
12 reserve the right to review and sign?

13 THE WITNESS: Yes.

14 MR. KOWALSKI: Okay. Reserved.

15
16 ---oOo---

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN RE THE MATTER OF:)

U.S. SCRAP CORPORATION)
Chicago, Illinois)

and)

9th AVENUE DUMP)
Gary, Indiana)

I, YOLANDA TYREE, state that I have
read the foregoing transcript of the testimony given
by me at my deposition on the 21st day of September,
1988, and that said transcript constitutes a true
and correct record of the testimony given by me at
said deposition except as I have so indicated on the
errata sheets provided herein.

Yolanda Tyree

No corrections (Please initial) _____
Number of errata sheets submitted _____ (pages.)

SUBSCRIBED AND SWORN TO
before me this _____ day
of _____, A.D., 1988.

Notary Public

1 STATE OF ILLINOIS)
) SS.
2 COUNTY OF C O O K)

3
4 I, MARIA MIRAMONTES, CSR, a notary
5 public in and for the County of Cook and State of
6 Illinois, do hereby certify that Yolanda Tyree was
7 by me first duly sworn to testify to the truth, the
8 whole truth, and nothing but the truth, and that the
9 above deposition was recorded stenographically by me
10 and reduced to typewriting by me.

11
12 I FURTHER CERTIFY that the foregoing
13 transcript of the said deposition is a true,
14 correct, and complete transcript of the testimony
15 given by the said witness at the time and place
16 specified hereinbefore.

17
18 I FURTHER CERTIFY that I am not a
19 relative or employee or attorney or counsel of any
20 of the parties, nor a relative or employee of such
21 attorney or counsel, or financially interested
22 directly or indirectly in this action.

23
24

1 I FURTHER CERTIFY that my certificate
2 annexed hereto applies to the original and typed
3 transcripts only, signed and certified transcripts
4 only. I assume no responsibility for the accuracy
5 of any reproduced copies not made under my control
6 or direction.

7
8 IN WITNESS WHEREOF, I have hereunto
9 set my hand and affixed my seal of office at
10 Chicago, Illinios, this 3rd of October, A.D., 1988.

11
12 Maria Miramontes
13 MARIA MIRAMONTES
14 188 West Randolph Street
Chicago, Illinois 60601
(312) 984-1033

15 C.S.R. License No. 084-003283

16 My notary commission
17 expires August 2, 1992.



11

K

SHOT TANK TO LOAN NOW COST

35⁰⁰ DeHed

4804 - Buff
5804 - Blue
DEPOSITION
EXHIBIT
Martell #151
F.D. 11-21-88

	CUSTOMER	FIRST PRICE	PRICE	SERVICE STARTED	DATE RAISED
1	Occutronics	225.00	1.0		1/29/74
2	Allis Chalmers	2.20			
3	American Can - Western	3.60	4.25		10/1/73
4	" " Hammond	3.60	4.25		10/1/73
5	" " Maywood	3.60			
6	" " Barrington	6.00			1/29/74
7	American Nameplate	4.50		9/19/73	
8	American Rivet	5.00		9/17/73	
9	Anderson Mfg	5.00		9/5/73	
10	John & Armitage	5.00		8/15/73	
11	Doland Chem - Cal City	4.00	5.00		10/1/73
12	Auer	4.00		9/4/73	
13	Barnett Varnish	4.00		1/25/73	
14	Bottomaster	5.00		11/30/73	
15	Bryer Schultz	4.00		4/13/73	
16	Cargill	4.00		1-9-74	
17	Cel Film	3.00	5.00	5-3-73	4-1-74
18	Chgo Adhesive	3.80	5.00		10-1-73
19	Chgo Decal	3.00	5.00		10-1-73
20	Chgo Nameplate	4.00	5.00		10-1-73
21	Chgo Roto Print	4.00		12-21-73	
22	Clark Oil	3.00			
23	Commander Pkg	5.00	7.00		10-1-73
24	Com'l Can - 65 ⁴⁰	3.60	4.25		10-1-73
25	" " Kilpatrick	3.60	4.25		10-1-73
26	Counton Saw	5.00		3-19-74	
27	Cook County Hosp	100.00	100.00	6-14-73	
28	C.P. Clare	7.50		7-5-73	
29	De Soto Kottres	3.00	4.00		1-1-74
30	" H to	3.00	4.00		1-1-74
31	R.R. Donnelly	5.00	6.00		1-1-74
32	Eko Products	4.00		7-27-73	
33	Eggen Machine	5.00		7-30-73	
34	Jed. Jod & Plastics	5.00		6-28-73	
35	Flinx	3.50			4-1-71
36	Fox Valley	4.00		7-23-73	
37	Furnas	3.00	6.00		5-1-74
38	C.P. Hall	10.00		3-7-73	
39	Heritage Ink	4.00		1-15-73	
40	Horrell	4.00		3-26-73	

CHICK LAST LOG OF

More + 800

		1	2	3	4
1	J M Huber	4.00	5.00		10-1-73
2	Hygrade Foods	4.00		3-28-73	
3	Staglis	4.00	5.00		10-1-73
4	K.M.S. Co.	5.00		12-27-73	
5	LA SALLE NAT'L BANK	100.00 min	150.00		
6	McWHORTER Chem	4.00		8-23-73	
7	Michil Oil - Cera	4.00		5-25-73	
8	Modene Mfg	4.50		7-25-73	
9	Morton Chem Ringwood	5.00			
10	" " Elk Grove	3.50			
11	Namaco	5.00		9-7-73	
12	Nat'l Cam 51st	4.00	5.00		10-1-73
13	" " Melrose PR	3.00	4.00		10-1-73
14	" " Kedzie	3.00	4.00		10-1-73
15	" " La Porte	4.40		3-1-73	
16	Pierce Stevens			1-9-73	
17	Poncher Inel	5.00		8-2-73	
18	Randall	3.00	4.00		1-1-74
19	Richardson Graphics	4.00		9-5-73	
20	R-Lite	5.00		9-21-73	
21	Ruptolium			5-8-73	
22	Reflector Hardware	4.00	5.00		10-1-73
23	Schmidgall	5.00		8-27-73	
24	Scholle	4.00	5.00		10-1-73
25	Shreeve	4.50		2-1-74	
26	Shel	4.00		4-11-73	
27	Size Control	4.00		5-10-73	
28	Standard T. Federal	3.60	4.25		10-1-73
29	" " H to	3.60	4.25		10-1-73
30	Sommer Maca	5.00		8-1-70	
31	Sun Chem NL	3.00			
32	Thiele - Engdahl	3.25	5.00		2-28-73
33	U.S. Steel Prods.	3.00		9-27-73	
34	U.P.S.	100.00 min		8-22-73	
35	Valical	5.00	6.00		10-1-73
36	Victor Gasket	4.00		8-22-73	
37	Wilson Sporting Goods	5.00		7-17-73	
38	Wm Wrigley	5.00		7-17-73	
39	Universal	5.50	6.50		
40	Sun Chem - Lycra	3.00		3-1-73	

4804 - Blue
5804 - Blue
8804 - Green

	1	2	3	4
1	Union Camco	4.00		2-20-73
2	Xerox	100.00 min		3-8-74
3	Sell Bronze	3.00	4.00	10-1-72
4	Pyle Nalch			4-15-74
5	Chgo Metals	1.50		74
6	Armstrong Chem	4.00		6-21-73 ONLY
7	Baz Kraft	3.00		8-9-73
8	Bradford mfg			3-14-74
9	B+T Plastics	5.00		7-25-73 ONLY
10	Central Scientific	100.00 min		8-9-72 ONLY
11	Chem-Trust	4.00		11-17-73 ONLY
12	Conservative Chem			11-25-73
13	C.P.C. INTER'L	4.00		3-23-73
14	Croname	200 MT		6-4-73 ONLY
15	Desa Ind	100.00		8-10-73
16	Elliott Paint	3.50		10-6-73 ONLY
17	Felt Prods	100.00 PER LOAD		9-20-73
18	Good Ind	3.00		11-2-73
19	Graph On	100 MIN		6-8-73
20	Harrah	3.00		1-3-73
21	Hausman Hard Chrome	10.00		7-16-73
22	Henthath	6.00		12-21-73
23	J+S Tmill	3.00		5-21-73
24	Knapp + Washburn	100.00 min		7-10-73
25	Midwest Elec	5.00		1-8-73
26	Mirror Reflector			8-1-73 ONLY
27	Nat'l Bronze	100 MIN		3-27-73
28	Northwest Screen Print	4.00		4-5-73
29	Northwestern Univ	100.00 PER LOAD		5-3-73 ONLY
30	Owens Corning	4.00		10-2-73
31	Rock-Ola	5.00		8-2-73
32	Roim + Haas	4.00		9-29-73
33	Rollprint Pkg Prods	200.00 min		12-20-73
34	Specialty Coatings	5.00		10-24-73
35	Stauffer Chem	5.00		11-13-73
36	Transport Service	5.00		9-1-73
37	Pennar	5.00		6-30-73
38	Triple B Etchants	3.85		6-29-73 ONLY
39	Wilson & Co	400.00 PER LD		5-9-73
40	Wyco Tool	4.00		6-25-73

01D

4804 - Buff
5804 - Blue

	CUSTOMER	1 PRICE	2 YEAR	3	4
1	Abbot Lab	4.00	71-72		
2	Advance Transformer	3.00	71		
3	Alco-Gravim	3.00	5-70		
4	Batz Lab	3.00	72		
5	Big Ben	3.00	69		
6	Callmet Screw Machine	3.00			
7	Central Solvent	2.50	69		
8	Cumco Solvent	11.00	69		
9	De Mest + Dougherty	3.00	7-1-70		
10	Glidden Co	4.00	70		
11	Sandsch Chem	3.00	69-70		
12	Hooker Glass	3.00	70		
13	Bruce Horn	3.00	70		
14	Kerr Chem	5.00	69		
15	Chewy Duw	3.50	70		
16	Luminaire Ceiling	4.00	71		
17	Moffet Tech Center	4.00	73		
18	Natl Celofilm	6.00	70		
19	Daisy Procs	2.00	70		
20	P.P.G. Inc.	5.50	72		
21	Reliable Eng	4.00	69		
22	Resins Solvents	2.50	69		
23	Sinclair + Val	2.00	71		
24	Sigoli Plating	5.00	69-70		
25	Slucent Chem	2.00	69		
26	Western Ebs	2.90	70		
27	Young Spring + Wire	3.50	71		
28					
29					
30					
31					
32					
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Sales for May 1975

#1

	1	2	3	4
1	5-7	11450	225-	
2		11451	247-	
3		11452	275-	
4		11453	440-	
5		11454	15750	
6		11455	100-	
7		11456	200-	
8		11457	175-	
9		11458	200-	
10		11459	316-	
11		11490	165750	
12		11491	165-	4191-
13				
14				
15				
16				
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Check List

		1	2	3	4	5
	C acct.		Date Rec'd	Inv. No.	amt.	daily amt.
1	Bretford Mfg		4-14	11255	100-	
2	C 190 Steel & Wire			11309	450-	
3	Clark Oil			11326	100-	
4	Interlake			11293	381-	
5	Royal Tube			11346	2048-	
6	Republic Steel			11299	350-	
7	Skil Corp.			11151	225-	
8	Xerox			11316	100-	3752-
9						
10	De Soto		4-15	11335	349-	
11	Hills - McConna			11147	240-	539-
12						
13	Contl Can		4-16	11167	191.25	
14	Inland Steel		4-16	11230	3142.50	
15	Intl. Harv.		4-16	11261	325-	
16	Jet Die Casting		4-16	11278	200-	
17	Motive Ind		4-16	11213	300-	
18	Motive Ind		4-16	11080	420-	
19	Motive Ind.		4-16	10947	300-	
20	Natl Can L.P.		4-16	11222	468.75	
21	Pastakum		4-16	11337	6.16-	
22	Spot Nails		4-16	11317	240-	
23	Univocal		4-16	11241-11302	1798.50	
24	U-S Steel Corp.		4-16	11321	355-	3357-
25						
26	Penn-Dixie Steel		4-17	11211	1333-	
27	Sun Chem Corp.		10949-11150-11200		996.50	2384.50
28						
29	W F Hall		4-18	11150	573-	
30	Clark Oil			11342	2479.41	
31	Libby			11356	200-	
32	Prec. Twist Drill			11339	200-	3552.61
33						
34						
35						
36						
37						
38						
39						
40						

Check List

	1	2	3	4
1	Midwest Wrecking	5-12	2000-	
2	Brandenburg Dam.		400-	
3				
4	Benj Moore	11462	200-	
5	Cargill	11463	306-	
6	O.P. Clare	11421	221-	
7	Drexler 1st	11255-77	575-	
8	Intl Harv.	11371	325-	
9	Libby	11437	100-	
10	Ma Gee	11469	500-	
11	Revere	11444	9205-	
12	Spot Nails	11430	250-	11,652-
13				
14	Ill Tool Wks	5-13	140-	
15	Brightly Gal.	11433	245-	
16	Libby	11465	100-	
17	Contl Cleaning		250-	not dec.
18	Reflector Hardware	11239	355-	1540
19				
20	Culligan	5-14	11402	14550-
21	Regal Tube		11473	675-
22	" "	11415-29-33-37-40-41	7042 50	7566-
23				
24	Commercial Sol	5-15	11446	250-
25	Motive Ind		11341	420-
26	Natl. Prec. Cir.		11426	160-
27				532-
28	Clarke Oil	5-16	11453-51	6342.7
29	Intl Harv.		11375	325-
30	Wyman Gordon		11379	325-
31				7990-
32				
33				
34				
35				
36				
37				
38				
39				
40				

PLEASE
20/20 BUFF

#2

Sales week
4-11

5

April 1975

805.00 +
740.00 +
783.00 +
2594.25 +
3347.00 +
2130.00 +
14399.25 *

3

4

Amer. Can -
Benj Moore
Boyle Midway
Chgo Sheepskin
Dreablan PT
H. well & Co.
Libby McNeill
Mager Chem.
Maclean Fagg
Morton Chem.
Natl. Can Corp

4-17
4-17

R. J. Briggs
Dreablan PT
Hendrickson Mfg.
Intl Harv.
Libby McNeill
Morton Chem
Natl Can L.P.
Kalsical Chem.
Venus Lab.

4-18
4-18

Chrome Rite
Culligan
Intl Multi Foods
Morton Chem
Shaveproot div.
Verex

11330	273-
11351	200-
11352	150-
11353	175-
11354	175-
11356	300-
11357	100-
11357	250-
11359	250-
11390	54950
11391	300-
11392	150-
11393	200-
11394	270-
11395	325-
11396	100-
11397	47250
11398	240-
11399	75-
11400	100-
11401	175-
11402	14550
11403	245-
11404	250-
11405	34650
11406	100-

2322.50

1975.50

1225-

Check List

5829.00 +
100.00 +
5079.50 +
1210.00 +
1558.00 +
0588.50 *

4805 - Bull
5805 - Bull
8805 - Green

	1	2	3	4	5
1	Cargill	4-21	11350	342-	
2	Rouland	11255-35-21-	11124	1377-	
3	Republic Steel		11333	520-	
4	Sid T. Chem.		11319	390-	✓ 2629-
5					
6	Libby	4-22	11372	100-	100-
7	Intl. Harv.	4-23	11250	325-	
8	Sara Lee		11322	459450	
9	Republic Steel		11361	160-	✓ 5079.50
10					
11					
12	Cngo Sheepskin	4-24	11257-96-11303	675-	
13	Morton Chem.		11314	355-	
14	Republic Steel		11375	150-	✓ 1210-
15					
16	Benj Moore	4-25	11351	200-	
17	Intl Harv Chrome		11370	312-	
18	Libby		11357	100-	
19	MasLean		11264	225-	
20	Mapee		11357	250-	
21	Uniroyal		11291	451-	✓ 1565-
22					
23					
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27					
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31					
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34					
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39					
40					

Chemical Sales

April 1975

		1	2	3	4
1	Chgo Sheepskin	4-22	11407	175-	
2	Chgo Steel + Wire		11408	450-	
3	Diceblan PT		11409	200-	
4	Intl Harvester		11411	225-	
5	La Salle Mgmt.		11412	150-	
6	Libby McNeill		11413	100-	
7	Maclean Fogg		11414	250-	
8	Regal Tube		11415	119250	
9	Univocal		11416	557-	369950
10					
11	Martin Senour PT	4-24	11419	575-	
12	Republic Steel		11417	200-	
13	Intl Can Corp.		11415	200-	
14	Martin Senour PT		11420	525-	2100-
15					
16	C P Clare	4-25	11421	221-	
17	Chgo Auto Mint		11422	235-	
18	Diceblan PT		11423	125-	
19	Libby		11424	100-	
20	Magac Chem		11425	250-	
21	Intl Proc. Cir.		11426	160-	
22	Morton Chem		11427	425-	
23	Martin Senour PT		11428	200-	
24	Pittsburgh metals		11422	315-	
25	Regal Tube		11429	2230-	
26	Spot Nails		11430	250-	
27	Sea Chem		11431	19975	473375
28					
29					
30					
31					
32					
33					
34					
35					
36					
37					
38					
39					
40					

Money paid for
 5798.50
 775.00
 1703.00
 4276.50

Check List

	2	3	4	5
date rec'd	Inv. #	amt	Total	
4-28	11350	373-		
	11349	250-		
	11243	700-		
	11355	315-		
	11355	250-		
	11237-67-54-95-11315	3,543-		
	11359	160-		
	11360-74	1102.50	5778.50	
4-29	11347	100-		
	11401	175-		
	11331	300-		
	11396	100-		
	11404	100-	715-	
4-30	11392	150-		
		570-		
	11334	543-		
	11303	140-	1703-	

Clark Equip

Collis

Leavitt Tube

Magee Chem

Natl Van

Natl Rec Cir.

Regal Tube

Liberto Culver

Chrome Rite

Interlake

Libby

Xerox

RQ Briggs

Oingo Steel & Wire

San Chem

Venus Lab.

		1	2	3	4
1	Brightly Gal.	4-29	11423	245-	
2	Direblan		11434	200-	
3	Chgo. Sheepskin		11435	175-	
4	Intl. Harvester		11436	325-	
5	Libby McNeill		11437	100-	
6	Regal Tube		11438	720-	
7	" "		11439	35250	
8	" "		11440	675-	
9	" "		11441	182250	4445-
10					
11	Good Humor	4-30	11476	540-	
12	Motive Ind		11475	680-	
13	Rustoleum		11474	920-	
14	Regal Tube		11473	675-	
15	Rauland		11472	35550	
16	Pierce + Stevens		11471	375-	
17	Direblan PT		11465	200-	
18	Morton Chem.		11470	426-	
19	Magre Chem.		11469	250-	
20	Libby McNeill		11468	100-	
21	Intl. Harv.		11467	325-	
22	General Electric		11466	240-	
23	Chgo. Roto Print Co.		11464	225-	
24	Cargill		11463	306-	
25	Benjamin Moore		11462	200-	
26	Midwest Brass		11453	300-	
27	Precision Twist		11457	300-	
28	Kitchens of Sara Lee		11455	3960-	
29	Enterprise Wire		11454	1360-	
30	Clark Oil		11449	200-	
31	" "		11451	102430	
32	" "		11453	581777	
33	Uniroyal		11445	494-	
34	McWhorter Chem.		11446	252-	
35	Natl. Can		11447	200-	
36	Richardson Graphics		11448	292-	
37	Rexene		11442	9205-	20,175-
38					
39					
40					

Check List

1 2 3 4 5

Morton Chem
Intl Harv.
Specified Altg
Wyco Tool

5-1

11390
11311
11237
10850

549-
325-
264-
156-

✓129450

Dreeblan PT
Ill Tool Wks
La Salle Mgmt

5-2

11233
11412

200-
34650
150-

✓69650

Penn-Dixie
Intl Harv.
Libby
US Steel

5-5

11324
11354
11413
11343

2432-
325-
100-
155550

✓1141250

Boyle Midway
Cgo Sheepskin
Midwest Brass
Spot Nails

5-6

11407-11351-63-53
11458
11376

150-
700-
300-
250-

✓1400-

Libby
Republic Steel
Veisicol

5-7

11424
11417
11399

100-
200-
78-

✓378-

Contl. Can
Apeco

5-8

11365
11198

13175
198-

✓32915

#2

	1	2	3	4
1	Venus Lab.	5-12	11509	50 -
2	Scott Inc.		11503	120 -
3	Xerox		11507	100 -
4	Velsicol		11506	100 -
5	Uniroyal		11505	51350
6	Stein Hall		11504	750 -
7	Scholle		11503	320 -
8	Magee		11501	250 -
9	Libby		11500	100 -
10	Intl Harv.		11497	225 -
11	Dreelan Pt		11475	200 -
12	Dreelan Pt		11497	150 -
13	Island Chem.		11474	335 -
14	Brightly Gal.		11475	250 -
15	Chgo Roto Print		11496	250 -
16	Regal Tube		11493	317250
17				7078 -
18	Clark Equip.	5-15	11510	350 -
19	Amer Can		11511	25050
20	R A Briggs		11512	150 -
21	Chgo Sleepskin		11513	175 -
22	Cullis		11514	700 -
23	Dreelan Pt		11515	200 -
24	Howell		11516	120 -
25	Ind Hard Chrome		11517	144 -
26	Intl Harv.		11515	325 -
27	La Salle Mgmt.		11519	150 -
28	Libby McNeill		11520	100 -
29	Natl Can		11521	225 -
30	Regal Tube		11522	925 -
31	Republic Steel		11523	200 -
32				4224.50
33				
34				
35				
36				
37				
38				
39				
40				

Customer	Amounts past due					Remarks
	Present Balance	Less 30 D.	31 to 60 D.	61 to 90 D.	Over 90 D.	
peco	540-	342-	198-			pd 198.78
Benj Moore ✓	200-	200-				pd
Boyle Midway ✓	150-	150-				pd
Brightly Gal. ✓	245-	245-				pd
Cargill ✓	306-	306-				pd
Chgo + N.W.	415 ²⁵			415 ²⁵		overpaid
Chgo Roto Aint	1165-	706-	409-			
Chgo Sheepskin	875-	875-				700.76
Clark Oil	704.77	704.77				pd 6842.07 ⁵ / ₁₆
Collis Co.	700-	700-				
Conth. Can ✓	131.75	131.75				pd
CP Clate ✓	221.-	221-				pd
Culligan ✓	148 ⁵⁰	148 ⁵⁰				pd pd 575.5-12
Dreeblan Pt	2600					pd 200 ¹ / ₂
Electronic Ptg	168-		168-			
Enterprise Wite	3792-	3792-				pd 2432 ⁷ / ₅
Food Humor	1470-	1470-				
Hendrickson Mfg.	270-	270-				
Hot Point RE	480-	480-				
Howell ✓	600-	600-				pd 541 pd 325.5-12 pd 325 ⁷ / ₁₆
Intl Harv.	2520-					pd 325 ⁷ / ₁₆
Jones + Cleary	1737 ⁵⁰				1737 ⁵⁰	
Kara Lee	3960-	3960-				
La Salle Mgt ✓	150-	150-				pd ⁷ / ₂
Libby ✓	100-	100-				pd ⁷ / ₅
Linkbloom HS	100-	1	100-			
Mac Clean Fogg	500-	500-				
Magee Chem ✓	500-	500-				
Martin Senour	1900-	1900-				
Midwest Brass ✓	300-	300-				300
Midwest Recy.	125-				125-	Central
Morton Chem.	2152 ⁵⁰	2152 ⁵⁰				pd 549.5
Notre Ind.	1050-	630-	420-			420
Natl Can L.P.	1830-	1480-	350-			

Customer	Amounts Past Due					Remarks
	Present Balance	Less 30 D.	31 to 60 D.	61 to 90 D.	Over 90 D.	
att. Precision Cir.	160-	160-				pd
Pierce + Stevens	375-	375-				pd
Pittsburgh Metals	315-	315-				
Precision Twist Drill	300-	300-				
Pauland	652 ⁵⁰	652 ⁵⁰				
Reflector Hardware	355-	355-				pd
Regal Tube	7717 ⁵⁰	7717 ⁵⁰				pd
Republic Steel	200-	200-				pd
Revere	9205-	9205-				pd
Richardson Graphics	292-	292-				pd
Rustoleum	920-	920-				pd
Safe proof Div.	346 ⁵⁰	346 ⁵⁰				pd 7/2
Specified Pltg.	264-		264-			pd 5/1
Specialty Coatings	247 ⁵⁰	247 ⁵⁰				
Spot nails	500-	500-				pd 250.75 pd
T.E. Staley	150-	150-				
Stein Hall	1440-	1440-				be here 5/30
Sun Chem HL	1997 ⁵⁰	1997 ⁵⁰				
Texas	1775 ⁵⁰		1775 ⁵⁰			
Thor. Power	300-		300-			
Transport Service	190-	90-	100-			
Unroyal	1858-	1858-				pd
S Steel Gary	1555 ⁵⁰		1555 ⁵⁰			pd 5/1
Wandercool	140-			140-		pd
Welscol	78-	78-				pd
Wexus Lab.	140-	140-				
Wyeo Tool	156-				156-	pd 5/1
Wymen Gordon	825-	525-	225-			pd 5/1
Total	69,051.82					

AGREEMENT

THIS AGREEMENT made the 6th day of January, 1976 by and between LIQUID ENGINEERING CORP., an Illinois Corporation, U. S. SCRAP CORP., an Illinois Corporation and STEVE MARTELL, of Dolton, Illinois, the ~~corporation, hereinafter referred to as, "Company", Steve Martell herein~~ after referred to as "Shareholder", and all three collectively referred to as "Seller", and LIQUID WASTE, INC., an Illinois Corporation, hereinafter referred to as "Purchaser".

WHEREAS the Company owns and operates a service business for the picking up, hauling and disposing of liquid pollutants and waste from and with businesses and companies in the Chicago Metropolitan area, both in container (Drums) and without containers (vacuum tank truck pickup), and

WHEREAS the Purchaser is engaged in the picking up, hauling and disposing of liquid pollutants and waste without containers by vacuum tank trucks in the Chicago Metropolitan area, and

WHEREAS, Seller desires to terminate its service relating to the pickup, hauling and disposing of liquid pollutants and wastes without containers presently done through use of vacuum tank trucks, and Seller desires to sell to Purchaser all their rights in and to the customer accounts of such business, and other assets, and

WHEREAS, Purchaser desires to purchase from Seller its rights to engage in said business with the customers of Seller, and

WHEREAS, Seller desires to assist Purchaser in the implementing of the transition of Sellers' customers to the use of Purchaser's services in said business,

~~NOW THEREFORE IT IS AGREED AS FOLLOWS:~~

1. Sale of Business. The Seller does hereby sell to Purchaser all their right, title and interest in and to all their customer accounts (as set forth in Exhibit "A" attached hereby and by reference made a part hereof); the goodwill of Seller's business; the exclusive right to use the trade name

"Liquid Engineering Corp."; all records pertaining to 1975 invoices, any customer lists not included herein and correspondence, files, research data and work in progress to effect an easy transition of business, customers contracts and purchase orders, customer information records and dispatch cards.

2. Exclusions. This sale does not include any cash on hand or in banks or otherwise. Nor does this sale include books of accounts or other records not named in paragraph 1, of Seller's business, but these books of account and records shall remain on Seller's premises or otherwise be available to Purchaser, for a period of six months hereafter during which time the Purchaser may inspect them for the purpose of familiarizing itself with the operation of Seller's business or to assist in causing an easy transition of Seller's service to its customer accounts to Purchaser's services to the same. Seller shall make such records available to Purchaser at reasonable times upon request by Purchaser. Nor does the sale include any accounts receivable due or owing to Seller on or before this date.

3. Present Accounts Receivable. In the event any checks or other proceeds are received by the Purchaser in payment of accounts receivable due or payable to Seller at this date, Purchaser shall immediately turn over all said checks and proceeds to the Seller in the form in which they are received. The Seller shall have the right to endorse the name Liquid Engineering Corp., or U. S. Scrap Corp., (whichever is appropriate) on all such checks and other proceeds, and deposit such checks and other proceeds in any bank account maintained by Seller.

4. Obligations of Seller. All accounts payable and other liabilities incurred by Seller up to the date hereof in the operation of its business or otherwise, are and shall solely remain the obligations of the Seller. Purchaser does not assume any of Seller's accounts payable or other liabilities whatsoever.

~~5. Contracts. The parties hereto do hereby acknowledge that the~~
contracts and customer arrangements with the customers as listed on Exhibit "A" are both oral and written, however, all such contracts are cancellable by customer or Seller at will, either with notice or without notice as the case may be. Purchaser assumes the risk relating to the continuance of all contracts and customer arrangements. Further, Seller makes no

representations that these contracts and customer arrangements are assignable. Notwithstanding, the Seller, at the option of Purchaser, will undertake to notify any and all present customers of the Seller of the assignment of Seller's rights to the respective customer accounts and Seller will urge said customers to continue their liquid pollutant and waste business with the assignee, the Purchaser. All expenses incurred ~~in connection with such notification shall be borne by the Seller. The~~ Purchaser shall have the right to create and approve all written material in connection with such notification.

6. Purchase Price. The purchase price for all the assets referred to in Paragraph 1 is \$75,000.00, of which \$35,000.00 is attributable to the restrictive covenants referred to in Paragraph 7, \$30,000.00 to the customer accounts, and \$10,000.00 to good will, tradename and other intangible assets of the Seller. The sum of \$35,000.00 is payable to Seller upon the execution of this Agreement. The balance of \$40,000.00 is payable to Seller on the 6th day of January, 1977. Further, the Purchaser shall pay the Seller an additional \$25,000.00 for vacuum tank truck pick up business, attributable to the customer accounts, provided the amount of gross business done with the customer accounts as listed in Exhibit "A" within one year from this date shall be \$500,000.00 or more. The Purchaser shall pay the Seller no interest per annum on the balance remaining unpaid.

7. Restrictive Covenants. The Seller (and each of them) agrees that from the date hereof he will not (unless acting as an employee or agent of the Purchaser, or with the Purchaser's prior covenant), directly or indirectly own, manage, operate, control or participate in the ownership, management, operation or control over or in connection in any manner ~~with any business under a similar name to Liquid Engineering Corp., and~~ that for a period of three years after the date hereof Seller will not in any such manner, directly or indirectly, compete with, or become interested in any competitor of the Purchaser.

With reference to the Vacuum Tank Truck Pick-Up and Disposal Service, the Seller for a period of three years from the date hereof agrees that it shall not:

(a) Canvass, solicit or accept any such business from any customer accounts as set forth herein.

~~(b) Give any other person, firm or corporation the right~~
to canvass, solicit or accept any business from any customer accounts as contained herein.

(c) Directly or indirectly request or advise any customer account to withdraw, curtail or cancel its business with the Seller through its assignee, the Purchaser.

(d) Directly or indirectly disclose to any other person, firm or corporation the names of its customer accounts.

(e) Directly or indirectly induce or attempt to influence any employee of the Seller to not go to the employ of the Purchaser or to later terminate his employment with Purchaser.

The Seller and each of them agree that the remedy at law for any breach by any of them of the foregoing will be inadequate and that the Seller shall be entitled to injunctive relief in any Court of competent jurisdiction.

8. Liquidated Damages. In view of the difficulty of determining the amount of damages which may result to the Purchaser from a violation of any of the provisions of Paragraph 7, the Seller shall pay to Purchaser \$1,000.00 as liquidated damages for every such violation; provided, however, that the payment of such amount as liquidated damages shall not be construed as a release or waiver by the Purchaser of the right to prevent any such ~~violation in equity or otherwise. In the event of a law suit relating to~~ said alleged violations resulting in a judgment in favor of the Seller or in favor of the Purchaser, the losing party shall pay the other party reasonable attorneys fees not to exceed \$1,000.00 in each such law suit.

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9. Telephone Numbers. The Seller shall cause the immediate transfer of the telephone numbers used by Liquid Engineering Corp., specifically, 941-9180-1 & 2, 928-0700 and 928-0701 for the use of the Seller. Further, the Seller upon receiving any calls relating to the customer accounts

or any other messages, calls, notifications and announcements from the customer accounts, or relating to the Vacuum Tank Truck Pick-Up Service of Seller, shall immediately notify Purchaser of the same; and when appropriate Seller shall provide such caller or other persons with the proper telephone number and address of Purchaser.

10. Rights of Action. The Seller does hereby transfer and assign, as part of the consideration hereunder, any and all rights of action, cause of action, rights of damages it may have against Waste Management, Inc., or any of its subsidiaries or divisions for any violation of the law relating to the customer account known as Rexene Polymers Co., a Division of Dart Industries, Inc. Purchaser shall have the right to commence any legal action against said Waste Management, Inc., its subsidiaries or divisions as the Purchaser may deem proper and the Seller shall cooperate with Purchaser in the prosecuting of this action and the obtaining of information and the giving of testimony in Court or otherwise. All expenses and costs incurred in such litigation shall be solely borne by the Purchaser. Purchaser shall be responsible for all actions taken in said litigation and the Seller shall act as a witness, transmitter, of information and custodian of materials, and not as a litigant.

11. Employee. It is the intention of the Purchaser to hire Frank Brown as a salesman for the Purchaser. Seller agrees that it will urge Frank Brown to join the employ of Purchaser and that Seller shall terminate Frank Brown from its employ this date and warrants that it will not rehire Frank Brown in any capacity for a period of one year from the date hereof.

12. Seller Warranty. The Seller, and each of them, hereby warrants the following:

(a) That the Company (and each of them) is an Illinois Corporation, presently in existence and in good standing;

(b) The Company has good and marketable title to all its ~~properties and assets as set forth in Paragraph 1;~~

(c) That they have no knowledge or reasonable grounds to know of any litigation, proceeding, or governmental investigation pending or threatened against or relating to the Seller, its properties or business, which will effect, encumber or diminish the assets or rights to the assets as transferred hereunder;

(d) That all proceedings, meetings and resolutions required by law or by the provisions of this Agreement to be taken by the Seller, its Shareholders and Board of Directors in connection with the transactions provided by this Agreement, have been duly and validly taken;

(e) Seller has complete and unrestricted power to sell, transfer ~~and deliver to Purchaser all of the assets, business, goodwill and other~~ property sold hereunder, and the instruments executed, delivered, and to be executed and to be delivered, to the Purchaser hereunder are valid in accordance with terms and effectively vest in the Purchaser good and merchantable title to all said assets transacted in this Agreement, free and clear of any and all obligations, liabilities and encumbrances.

13. Resolutions. Seller shall provide Purchaser with certified copies of resolutions from the Board of Directors and Shareholders of the Company consenting to and assigning the assets and properties which are the subject of this transaction.

14. Benefit. All the terms of this Agreement shall be binding upon and inure to the benefit of, and shall be enforceable by, the respective legal representatives, successors and assigns of the Seller and Purchaser.

Steve Martell

U. S. Scrap Corporation

Liquid Engineering Corp.

15. Notice. All notices, requests, demands and other communications hereunder shall be in writing and shall be deemed to have been duly given if delivered or mailed first class, postage prepaid (a) if to the Seller, at P. O. Box 27151, Riverdale, Illinois 60627, or (b) if to the Purchaser, at 39 South La Salle Street, Suite 210 %Mr. Jack E. Charron, Chicago, Illinois 60603.

16. Enforceability. In the event any provisions or sub-paragraphs of this Agreement shall be void as against public policy or unenforceable, in whole or in part, it shall be deemed not to affect or impair the remaining portions of this Agreement. Further, each and every paragraph, term and condition contained in this Agreement is made separately and is hereby declared and agreed to constitute a separate distinct promise and covenant.

A note has been issued evidencing the \$40,000 - balance here - under

IN WITNESS WHEREOF the parties hereto have duly executed this Agreement:

Attest:

Secretary

Attest:

Secretary

LIQUID ENGINEERING COMPANY

BY

U. S. SCRAP CORP.

BY

STEVE MARTELL, Individually

LIQUID WASTE, INC.

Attest:

Secretary

BY

PRES.

The undersigned acknowledges the assignment of this agreement and the proceeds hereunder to Riverdale Bank.

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LIQUID WASTE, INC.

BY:

President

	CUSTOMERS	DISTANCE MILES	PRODUCT TYPE	PRICING	1975 to 11/31/75
1	Clark Equip.	51	oil	.06	4090
2	Benjamin Moore	32	solvent	.00	4552
3	Brightly Galvanized	48	acid	.07	7348
4	Industrial Chrome	53	acid	.00	2353
5	C-Products	5	chemical	.00	405
6	Miller Prepared Potatoes	60	food	.06	660
7	etc-Graphics	35	solvent	200 min.	200
8	Almont Plating	54	acid	.07	540
9	Powell-Co.	30	acid	300 min.	4800
10	Motive Industries	30	acid	.07	4141
11	Victor Products	3	chemical	250 min.	400
12	Lynan Gordon	67	acid	.07-1/2	1763
13	Precision Twist	20	acid	300 min.	3300
14	Food Pinner	5	food	.06	15768
15	Mark Oil	17	oil	.06	41707
16	Institute of Gas	35	chemical	300 min.	23952
17	Midwest Brass	5	acid	300 min.	2100
18	Leavitt Tube	47	acid	.07	2274
19	Spot Mills	13	oil	.10	6830
20	Republic Steel	18	acid-tar	.10 & .04	13058
21	Recoil Tube	18	acid	.04 3/4-.05	57422
22	Witchens of Sara Lee	18	food	.04-1/2	33057
23	International Foods	18	food	.07	4529
24	Acme Chem.	40	acid	250 min.	6350
25	The Collins Co.		acid	.20	7700
26	Acme	43	chemical	.05	107715
27	Enterprise Wire	4	acid	.04 1/2	14365
28	Proebian Pain	20	solvent	.05	12215
29	Lyeth Lab.	40	chemical	.06	485
30	Wandercook		oil	.07	408
31	Cott	32	chemical	.06	120
32	Cyclic-Midway	16	acid	150 min.	1050
33	F.M. Briggs	53	solvent	150 min.	2475
34	National Precision	25	acid	.08	3940
35	Libby, McNeill & Libby	6	food	.06	6666
36	Hendrickson Mfg.	30	oil	.06	390
37	Hills McGanna	60	oil	.06	6120
38	Maclean Fogg	60	oil	.05	6485
39	Martin Camour	20	solvent	.05	3925
40	Wilson Steel	38	acid	.06	2730

Chgo. Steel & Wire	11	acid	.05	5550
Chgo. Sheepskin Products	20	chemical	.05	9950
Whiting Corp.	4	oil	.06	750
Gracified Plating	25	acid	.06	774
Fiberbond Corp.	20	chemical	.04 1/2	2532
Hot Joint	.	oil	.06	760
Tomus Lab.	32	chemical	.04	2420
International Harvester	4	acid	.05	16748

(A division of
Austin Western (Clark Equip.)

Chrome rite

Container Corp. of America

Crown Cork & Seal

DeSoto, Inc.

Elkwood Plating

Graph-On

Hall Printing

Industrial Hard Chrome

Libby, McNeil & Libby

Midwest Plating

Midwest Brass Forgings

National Can Corp.

Niles Park Dist.

Republic Steel

Thor Power Tools

Jet Die Casting

Arnold's Engineering

Perk Foods Co.

Pittsburg Metals

Sun Chemical (Lyons) *LLC*

Belmont Plating